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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON D.C., 20460

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Buckman Labratories, Inc. 1256 North McLean Blvd Memphis, TN 38108-124

FEB 1 8 2010

Attention: Carl Watson Regulatory Manager

Subject: Notification D-25-5 EPA Reg. No. 1448-277 Amendment Letter dated January 15, 2010

This will acknowledge receipt of your notification for the aforementioned product labels, submitted under the provisions of FIFRA Section 3(c) (9). Based on a review of the submitted material, the following apply:

• Updating container disposal language per PR Notice 2007-4

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,

Marshall Swindell Product Manager (33) Regulatory Management Branch 1 Antimicrobials Division (7510C)

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			Applicatio	on for Pe	esticid	e - Sec	tion	1			
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4. Company/Product (Name) D-25-5					PM# 33						
5. Name and Address of Applicant <i>(Include ZIP Code)</i> Buckman Laboratories, Inc. 1256 N. McLean Blvd Memphis, TN 38108				6. Expedited Reveiw. In accordance wit (b)(i), my product is similar or identical in c to: EPA Reg. No				tical in co	composition and labeling		
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EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

Yellow - Applicant Copy

BUCKMAN LABORATORIES INTERNATIONAL, INC.

January 15, 2010

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1256 NORTH McLEAN BLVD. MEMPHIS, TN 38108-1241 U.S.A. TELEPHONE (901) 278-0330 FAX (901) 276-5343 www.buckman.com e-mail: knetix@buckman.com

Marshall Swindell, PM 33 Regulatory Management Branch I Antimicrobial Division (H7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22203-4501

Re: Label Revisions: PR Notice 2007-4 Pesticide Container and Containment Rule EPA Reg. Nos.: 1448-103, -115, -128, -180, -185, 198, -202, -277, -282, -283, -337, -338, -339, -389, -390, -391 & -392

Dear Mr. Swindell:

Buckman Laboratories submits the following amendment for the product labels listed below:

BUSAN 1058 (EPA Reg. # 1448-103) NM-875-11 (EPA Reg. # 1448-115) NM-35-1 (EPA Reg. # 1448-128) NM-175-11 (EPA Reg. # 1448-186) D-10-1 (EPA Reg. # 1448-185) D-25-1 (EPA Reg. # 1448-198) D-50-1 (EPA Reg. # 1448-202) D-25-5 (EPA Reg. # 1448-277) D-50-4 (EPA Reg. # 1448-282) D-10-14 (EPA Reg. # 1448-283) D-33-1 (EPA Reg. # 1448-337) D-33-2 (EPA Reg. # 1448-338) D-33-3 (EPA Reg. # 1448-339) D-33-5 (EPA Reg. # 1448-389) D-33-6 (EPA Reg. # 1448-390) D-33-7 (EPA Reg. # 1448-391) D-33-8 (EPA Reg. # 1448-392)

Please find enclosed the EPA application Form 8570-1 and 5 copies of the draft revised labels incorporating changes per comments from PR Notice 2007-4 regarding the Pesticide Container and Containment Rule. If you should you have any questions or require additional information, please feel free to contact me or Crystal Brown at (901) 272-8258 (<u>cwbrown@buckman.com</u>).

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.

Carl F. Watson, Ph.D. Sr. Regulatory Toxicologist

D-25-5

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Potassium dimethyldithiocarbamate
INERT INGREDIENTS
TOTAL

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25.0% 75.0% 100.0%

KEEP OUT OF REACH OF CHILDREN

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DANGER

	FIRST AID
lf in Eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for further treatment advice.
lf on Skin, Clothes	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
lf Swallowed	 Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water, if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
lf Inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
	HOT LINE NUMBER
	product container or label with you when calling a Poison Control Center or doctor or going for treatment. also contact 901-767-2722 for emergency medical treatment information.
	NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes eye and skin damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Avoid Contamination of food. Wear goggles or face shield and rubber gloves when handling. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not expose to extreme temperatures. Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spill should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at your EPA Regional Office for guidance.

CONTAINER DISPOSAL:

(Text for all nonrefillable containers)

D-25-5

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. {Liquid residue removal statement for nonrefillable containers with capacity of 5 gals or less}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for the later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{Liquid residue removal statement for nonrefillable containers with capacity of >5 gals}

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container % full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use of disposal. Repeat this procedure two more times.

(Text for all nonrefillable containers)

Then offer for recycling if available or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

{Text for refillable containers}

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. For containers larger than 55 gallons:

To clean the container prior to refilling or disposal, use a pressure wash as follows: Empty the remaining contents into application equipment or a mix tank. Use a pressure wash system that rinses all interior sides with water and that is rated at >40 psi and >120F. Pressure wash the container for a length of time that ensures that a minimum 25% of the container volume of water is used. During the pressure wash, ensure that the container valve is left open for continuous draining. Collect the rinsate and empty into application equipment or a mix tank or store rinsate for later use or disposal. Allow container to drain for 10 minutes after pressure wash is completed.

For containers 55 gallons and smaller:

To clean the container prior to refilling or disposal, use a triple rinse wash as follows: Empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously. Pour or pump rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this rinsing procedure two more times.

Do not discharge rinsate containing this product unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge rinsate containing this product to sewer systems without prior approval from the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Batch code:			
Manufactured by	Buckman Laboratories, Ind 1256 North McLean Blvd., Mer (901) 278-0330 or 1-800-282-50	nphis, Tennessee 38108, USA	ι Γ. (τ. (Γ. Γ. (Γ.
EPA Est. No.	 1448-TN-1		ζ τ. ιζιιζί ζ
EPA Reg. No.	1448-277	(ι (τ ι (ι ι ι ι,
Product Weight	9.3 lbs/gal 1.12 kg/l	Net contents are marked on the container	ι - (((
	NPCA Ratings nability 1 Reactivity 1	· · · · · · · · · · · · · · · · · · ·	Last Revision

D-25-5

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Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

COOLING WATER SYSTEMS: D-25-5 is used to inhibit the growth of microorganisms industrial, commercial and institutional cooling water systems. In noticeably fouled systems, D-25-5 should be added daily at a rate of 4.5 to 6.8 fl. oz. of D-25-5 per 1000 gallons of system water (40 - 60 ppm) until control is evident. Subsequent additions of D-25-5 should be made to the system as needed at a rate of 2.3. to 6.8 fl. oz. of D-25-5 per 1000 gallons of system water (20-60 ppm) to maintain control. The frequency of treatment depends upon the severity of the microbiological problem. For best results the system should be cleaned prior to treatment.

INDUSTRIAL AIR WASHER SYSTEMS: D-25-5 is used to inhibit the growth of microorganisms in industrial air washer systems. In noticeably fouled systems, D-25-5 should be added at a rate of 10.6 to 13.6 fl. oz. of D-25-5 per 1000 gallons of water (90-120 ppm) until control is evident. Subsequent additions of D-25-5 should be made to the system as needed at a rate of 7.9 to 13.6 fl. oz. of D-25-5 per 1000 gallons of water (70-120 ppm) to maintain control. The frequency of treatment depends upon the severity of the microbiological problem. For best results the system should be cleaned prior to treatment.

INDUSTRIAL WATER PURIFICATION SYSTEMS: D-25-5 is used to control microbiological fouling in industrial water purification systems including reverse osmosis, filters, clarifiers, and ion exchange equipment. For off-line treatment, D-25-5 should be fed at a concentration of 9.2 to 23.0 fl. oz. per 1,000 gallons of water (80-200 ppm) for 4 to 8 hours. For on-line maintenance treatment, feeding 2.3 to 4.6 fl. oz. D-25-5 per 1,000 gallons of water (20-40 ppm) for 6 to 12 hours should be made once a week or as needed to maintain control. Not intended for use in potable water systems. Not registered for this use in California.