

1448-389

02/18/2010

1/6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 18 2010

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. Carl Watson  
Senior Toxicologist for,  
Buckman Laboratories, Inc.  
1256 North McLean Blvd.  
Memphis, TN 38108-1241

Subject: D-33-5

EPA Registration Number 1448-389  
Your Notification Dated January 15<sup>th</sup>, 2010  
EPA Received Date January 19<sup>th</sup>, 2010

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to revise the Storage and Disposal section as per PR Notice 2007-4, is acceptable.

The notification has been made part of the file.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script that reads "Marshall Swindell".

Marshall Swindell  
Product Manager 33  
Regulatory Management Branch I  
Antimicrobials Division(7510P)



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 **Amendment**  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 1448-389	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) D-33-5	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Buckman Laboratories, Inc. 1256 N. McLean Blvd Memphis, TN 38108 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application.

Notification - Explain below.  Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)  
 Label Amendment: Non-PRIA action.  
 ACTION: Revise the Storage & Disposal Section in order to comply with PR Notice 2007-4  
 Contact: cfwatson@buckman.com; FAX: (901) 272-6256

**Section - III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product  
 Lithograph  Paper glued  Stenciled  Other \_\_\_\_\_

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Carl Watson	Title Sr. Regulatory Toxicologist	Telephone No. (Include Area Code) (901) 272-6228
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**Certification**  
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature 	3. Title Sr. Regulatory Toxicologist
4. Typed Name Carl F. Watson, Ph.D.	5. Date 15 January 2010

3/6

BUCKMAN LABORATORIES INTERNATIONAL, INC.

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

January 15, 2010

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. # 1448-180) ✓
- 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 ([cwbrown@buckman.com](mailto:cwbrown@buckman.com)).

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.

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

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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)

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 1/4 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 1/4 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 or 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, Inc.  
1256 North McLean Blvd., Memphis, Tennessee 38108, USA  
(901) 278-0330 or 1-800-282-5626

EPA Est. No. 1448-TN-1

EPA Reg. No. 1448-389

Product Weight 9.6 lbs/gal 1.15 kg/L

Net contents are marked on the container.

**HMIS / NPCA Ratings**

Health 3 Flammability 1 Reactivity 1

Last Revision

12/11/2009

### Directions for Use

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

D-33-5 is used in industrial and/or commercial recirculating cooling tower systems and industrial air-washing systems to control microbiological slime. Prior to the use of D-33-5, in industrial and/or commercial recirculating cooling tower systems, systems should be cleaned to remove algal growth, microbiological slime, and other deposits. Then make an initial slug addition of 3.3 to 4.9 fl oz of D-33-5 per 1000 gal of water to provide 30 to 45 ppm of D-33-5, based on the total weight of water in the system. Repeat initial dosage until control is evident. Make subsequent slug addition of 1.6 to 4.9 fl oz of D-33-5 per 1000 gal of water (15 to 45 ppm D-33-5) every 2 to 5 days or as needed. The frequency of addition depends upon the relative amount of bleedoff and the severity of the microbiological problem. Slug additions should be made in the sump of recirculating cooling tower systems.

D-33-5 is used in industrial air-washing systems which maintain effective mist-eliminating components. Prior to its use, systems should be cleaned to remove bacterial slime and other deposits. An initial slug dose of 7.7 - 9.8 fl oz of D-33-5 per 1000 gal of water is recommended. Repeat initial dosage until control is evident. Subsequent slug additions of 5.7 - 9.8 fl oz of D-33-5 per 1000 gal of water should be employed every 1 to 5 days, or as needed. The frequency of addition depends upon the relative amount of bleedoff and severity of the bacterial problem. Slug additions may be made to the sump or the water collection trays of the airwash system.

