



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

NOV - 5 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Carl F. Watson, Ph.D.
Sr. Regulatory Toxicologist
Buckman Laboratories, Inc.
1256 N. McLean Blvd.
Memphis, TN 38108

Subject: **WSKT**
EPA Registration No. 1448-396
Your Letter Dated September 27, 2002

Dear Dr. Watson:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with comments.

Proposed Amendment:

- Addition of new use to MUP label, "Petroleum Secondary Recovery Systems"

General Comments

1. Separate the precautionary statement subheading from the first aid statements. In addition, the precautionary subheading and its statement must be grouped together, and read as follows:

Precautionary Statement
Hazards to Humans and Domestic Animals
Danger

Corrosive. Causes eye and skin burn. Harmful if swallowed or if inhaled.
Do not get in eyes, on skin, or on clothing. Avoid breathing spray mist.
Wear protective eyewear (goggles, face shield, or safety glasses.)
Prolonged or frequently repeated skin contact may cause allergic reactions
in some individuals. Wash thoroughly with soap and water after handling.
Remove contaminated clothing and wash clothing before reuse.

2. The child signal word Danger, and the Keep Out of Reach of Children statement must be placed under the ingredient statement.

3. Revise the Personal Protective Equipment (PPE) language to read as follows:

Personal Protective Equipment

Applicators and other handlers must wear.

- coveralls, over long-sleeved shirt and long pants
 - socks and chemical resistant foot wear;
 - goggles or face shields,
 - chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, viton).
- For mixing/loading: Wear a chemical resistant apron.

4. The following User Safety Requirements and Recommendations must be added to the label:

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

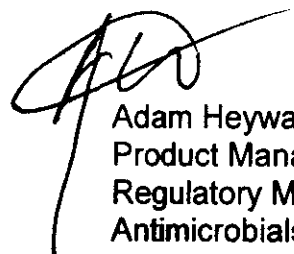
User Safety Recommendations

"Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly."

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



Adam Heyward
 Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510C)

Enclosure



WSKT

KEEP OUT OF REACH OF CHILDREN

DANGER

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

FIRST AID	
If 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.
If on Skin, Clothes	- Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center for treatment advice.
If Ingested	- 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.
If 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	
Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also contact 901-278-0330 or 1-800-BUCKMAN for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

DANGER: Corrosive. Causes eye damage and skin burns. May cause allergic skin reaction. Harmful if inhaled. Avoid breathing spray mist. Harmful if swallowed. Do not get in eyes, on skin, on clothing. Mixers, loaders and others exposed to this product must wear: long-sleeved shirt and long pants; chemical resistant gloves such as nitrile or butyl rubber, shoes plus socks; goggles and face shield; and chemical resistant apron. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist use detergent and hot water. Keep and wash PPE separately from other laundry. Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly. This product may cause skin sensitization reactions in some people.

ENVIRONMENTAL HAZARDS: This chemical is toxic to terrestrial and aquatic plants, fish and aquatic invertebrates. 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. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on the label

PHYSICAL AND CHEMICAL HAZARDS: This product is corrosive to mild steel.

ACTIVE INGREDIENTS:	
Poly[oxyethylene(dimethylamino)ethylene]	12.0%
(dimethylamino)ethylene dichloride]	
5-Chloro-2-Methyl-4-isothiazolin-3-one	1.04%
2-Methyl-4-isothiazolin-3-one	0.37%
INERT INGREDIENTS:	86.59%
TOTAL	100.00%

Storage and Disposal

PESTICIDE STORAGE: Do not contaminate food or feed by storage, disposal or cleaning of equipment. Do not store or transport in unlined metal containers.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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 of the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

METAL CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

PLASTIC CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL: CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.

Manufactured by

Buckman Laboratories, Inc.

1256 North McLean Blvd., Memphis, Tennessee 38108, USA
(901) 278-0330 or 1-800-BUCKMAN

EPA Est. No. 1448-TN-1

EPA Reg. No. 1448-396

Net contents are marked on the container.

Product Weight 9.0 lbs/gal 1.04 kg/l

HMIS / NPCA Ratings

Last Revision

Health 3 Flammability 1 Reactivity 1

9/26/2002

374

484

Directions for Use

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

FOR FORMULATION USE ONLY: For formulation into a microbicide for the following uses: recirculating cooling water systems, industrial air wash systems, fire water protection systems, metalworking fluid systems, and petroleum secondary recovery systems.

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

NOV - 5 2002

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1448-396**