

1448-408

7-2-2003

1/10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Buckman Laboratories, Inc.
1256 N. McLean Blvd.
Memphis, TN 38108

JUL 2 2003

Attention: Jody, L. Stobbe

Subject: **BUSAN 1350**
EPA Registration No. 1448-408
Application Date: June 6, 2003
EPA received Date: June 9, 2003

This will acknowledge receipt of your notification, "for additional brand name" submitted under the provisions of FIFRA section 3 (c) 9. Based on a review of the material, the following comment apply.

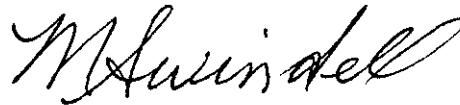
Additional Brand Name:

"BULAB 3849"

This application is acceptable and has been made a part of the records for this file.

If you have any question concerning this letter, please contact me at (703) 308-6230 or Portia Jenkins at (703) 308-6230.

Sincerely,



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

CONCURRENCES

SYMBOL							
SURNAME							
DATE							



Read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

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United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1448-408	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) BUSAN 1350	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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Alternate Trade Name: BULAB 3849
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of these products. I understand that it is a violation of 18 USC, § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jody L. Stobbe	Title Senior Regulatory Specialist	Telephone No. (Include Area Code) 901-272-8550
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 Senior Regulatory Specialist	
4. Typed Name Jody L. Stobbe	5. Date June 5, 2003	



ACTIVE INGREDIENT(S)	
2-(Thiocyanomethylthio)benzothiazole.....	8.0%
Methylene bis(thiocyanate).....	8.0%
INERT INGREDIENT(S)	84.0%
TOTAL	100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

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 or doctor for treatment advice.
If 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.
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.

Precautionary Statements

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes irreversible eye damage and skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Do not breathe dust. Wear goggles or face shield, a mask or pesticide respirator jointly approved by MSHA and OSHA, protective clothing and shoes, and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. 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.

Directions for Use

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

Bulab 3849 is packaged in water soluble bags for the purpose of providing application convenience and increased safety to the end user. These bags are further packaged in water resistant enclosures that are designed to protect the water soluble bags and keep them dry. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure. Application dosages are recommended to take advantage of available package sizes thus allowing use of the total contents of each bag. The bags should be placed in the system in an area of good flow to ensure adequate dispersion.

NEVER OPEN INDIVIDUAL BAGS. INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER WHEN NOT IN USE.

HIDES AND SKINS: Please see the product data bulletin entitled, "Bulab 3849 Product/Use Information Sheet-Hides and Skins"

LEATHER: Please see the product data bulletin entitled, "Bulab 3849 Product/Use Information Sheet- Leather Applications"

AUTOMATED SYSTEMS: Please see the product data bulletin entitled, "Bulab 3849 Product/Use Information Sheet - Automated Cooling Water Systems."

COOLING WATER: Please see the product data bulletin entitled, "Bulab 3849 Product/Use Information Sheet - Cooling Water Systems".

PETROLEUM SECONDARY RECOVERY: Please see the product data bulletin entitled, "Bulab 3849 Product/Use information Sheet - Petroleum Secondary Recovery."

DRILLING, FRACTURING AND REWORK FLUIDS: Please see the product data bulletin entitled, "Bulab 3849 Product/Use Information Sheet - Drilling, Fracturing, and Rework Fluids."

SAPSTAIN AND MOLD CONTROL: Please see the product data bulletin entitled, "Bulab 3849 Product/Use Information Sheet - for Sapstain and Mold Control"

Do not contaminate water

PESTICIDE STORAGE: Store product in a cool dry area. If product is spilled or the container is damaged, dispose of in accordance with local, state, and federal regulations.

PESTICIDE DISPOSAL: Do not mix excess pesticide, spray material, or other chemicals with this pesticide. Do not be disposed of in any way that may cause harm to humans, animals, or the environment. Contact your EPA Regional Office for disposal instructions.

CONTAINER DISPOSAL: Do not reuse or refill this container. If the container is damaged, do not use. If burned, stay out of the container. Do not incinerate, or by incineration.

Manufactured by

1256 North McL...

EPA Est. No.

EPA Reg. No.

Product Weight

HMS

Health 3 Flar

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Buckman Laboratories, Inc.

1256 N. McLean Boulevard, Memphis, TN 38108. Phone: (901) 278-0330. Fax: (901) 274-8035

BULAB 3849

Product/Use Information Sheet HIDES AND SKINS

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole.....8.0%

Methylene bis(thiocyanate).....8.0%

INERT INGREDIENTS:.....84.0%

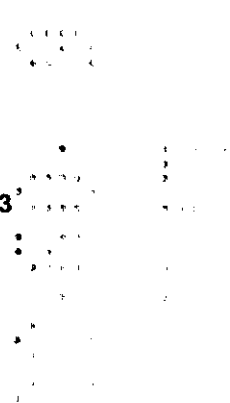
Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water soluble bags for the purpose of providing application convenience and increased safety to the end user. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure.

NEVER OPEN INDIVIDUAL BAGS, INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER.

HIDES AND SKINS (1 pound bags): BULAB 3849 is used to prevent bacterial decomposition of brine-cured hides and skins. BULAB 3849 should be used at a level of **1.0 to 3.0 1-lb bag(s) per 1000 lbs** of green fleshed hides or skins. The packets of BULAB 3849 should be added prior to or immediately after the hides to the raceway. To assure adequate mixing, the bags should be individually introduced to the input side of the raceway paddle.

HIDES AND SKINS (4 ounce bags): BULAB 3849 is used to prevent bacterial decomposition of brine-cured hides and skins. BULAB 3849 should be used at a level of **2 to 10 4-oz bag(s) of BULAB 3849 per 1000 lbs** of green fleshed hides or skins. The packets of BULAB 3849 should be added prior to or immediately after the hides to the raceway. To assure adequate mixing, the bags should be individually introduced to the input side of the raceway paddle.



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BULAB 3849

Product/Use Information Sheet LEATHER APPLICATIONS

ACTIVE INGREDIENTS:

2-Thiocyanomethylthio)benzothiazole.....	8.0%
Methylene bis(thiocyanate).....	8.0%

INERT INGREDIENTS:.....84.0%

Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water soluble bags for the purpose of providing application convenience and increased safety to the end user. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure.

NEVER OPEN INDIVIDUAL BAGS, INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER.

LEATHER (4 ounce bags): BULAB 3849 is used to prevent bacterial decomposition of hides and skins during the soaking process. BULAB 3849 should be used at a level of **4 to 8 4-oz bags per 1000 lbs** of green or brine fleshed hides or skins. BULAB 3849 is used to prevent mold growth on chrome or vegetable-tanned hides or skins during tanning or post tanning operations prior to finishing. BULAB 3849 is used at treatment rates of **2 to 12 4-oz bags per 1000 lbs** of white weight stock. Individual bags of BULAB 3849 can be added directly to the tanning drum or vessel or dissolved in a chemical mix box during the tanning process.

LEATHER (1 pound bags): BULAB 3849 is used to prevent bacterial decomposition of hides and skins during the soaking process. BULAB 3849 should be used at a level of **1 - 2 1-lb bag(s) per 1000 lbs** of green or brine fleshed hides or skins. BULAB 3849 is used to prevent mold growth on chrome of vegetable-tanned hides and skins during tanning or post tanning operations prior to finishing. BULAB 3849 is used at treatment rates of **1- 3 1-lb bag(s) per 1000 lbs** of white weight stock. Individual bags of BULAB 3849 can be added directly to the tanning drum or vessel or dissolved in a chemical mix box during the tanning process.

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BULAB 3849

Product/Use Information Sheet AUTOMATED COOLING WATER SYSTEMS

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole.....	8.0%
Methylene bis(thiocyanate).....	8.0%
INERT INGREDIENTS:	84.0%

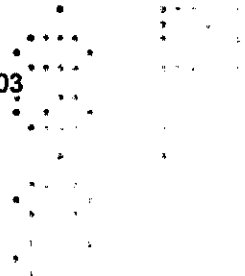
Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water soluble bags which are enclosed in containers to be used in automated feed equipment for the purpose of providing application convenience and increased safety to the end user. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure.

NEVER OPEN INDIVIDUAL BAGS. INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER.

AUTOMATED COOLING WATER SYSTEMS (4 ounce bags): BULAB 3849 is used to inhibit the growth of microorganisms in automated industrial and commercial recirculating cooling water systems. To apply BULAB 3849 in the 21st Century Innovations or Solid-Pro, Inc. automated feed and dispensing equipment system, remove one of the dosing-canisters from the box. Remove the canister lid, invert the canister and attach it tightly onto the diluting (mixing) unit of the system. The system should be set up to dispense enough BULAB 3849 to achieve a residual of 30 to 120 ppm of product per 1,000 gallons of system water every 1 to 5 days. In noticeably fouled systems, dispense enough BULAB 3849 to achieve a residual of 60 to 240 ppm of product per 500 gallons of system water until control is evident. *For best results the system should be cleaned prior to treatment*

AUTOMATED COOLING WATER SYSTEMS (1 pound bags): BULAB 3849 is used to inhibit the growth of microorganisms in automated feed industrial and commercial recirculating cooling water systems. To apply BULAB 3849 in the 21st Century Innovations, Jaytech, or Solid-Pro, Inc. automated feed and dispensing equipment system remove one of the dosing-canisters from the box. Remove the canister lid, invert the canister and attach it tightly onto the diluting (mixing) unit of the system. The system should be set up to dispense enough BULAB 3849 to achieve a residual of 30 to 120 ppm of product per 4,000 gallons of system water every 1 to 5 days. In noticeably fouled systems, dispense enough BULAB 3849 to achieve a residual of 60 to 240 ppm of product per 2000 gallons of system water until control is evident. *For best results the system should be cleaned prior to treatment*



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BULAB 3849

Product/Use Information Sheet COOLING WATER SYSTEMS

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole.....	8.0%
Methylene bis(thiocyanate).....	8.0%

INERT INGREDIENTS:.....	84.0%
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Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water-soluble bags for the purpose of providing application convenience and increased safety to the end user. These bags are further packaged in water-resistant enclosures that are designed to protect the water-soluble bags and keep them dry. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure. Application dosages are recommended to take advantage of available package sizes thus allowing use of the total contents of each bag. The bags should be placed in the system in an area of good flow to ensure adequate dispersion.

NEVER OPEN INDIVIDUAL BAGS, INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER WHEN NOT IN USE.

COOLING WATER SYSTEMS (1 pound bags): BULAB 3849 is used to inhibit the growth of microorganisms in cooling water systems. In noticeably fouled systems, BULAB 3849 should be added daily at a rate of **1 to 4 1-lb bag(s) of BULAB 3849 per 2000 to 5000 gallons of system water** until control is evident. Subsequent additions of **1 to 2 1-lb bag(s) BULAB 3849 per 2000 to 5000 gallons of system water** to maintain control. The frequency of treatment depends on the severity of the microbiological problem. *For best results the system should be cleaned prior to treatment.*

COOLING WATER SYSTEMS (4 ounce bags): BULAB 3849 is used to inhibit the growth of microorganisms in cooling water systems. In noticeably fouled systems, BULAB 3849 should be added daily at a rate of **1 to 4 4-oz bag(s) of BULAB 3849 per 500 to 1000 gallons of system water** until control is evident. Subsequent additions of **1 to 2 4-oz bag(s) BULAB 3849 per 500 to 1000 gallons of system water** to maintain control. The frequency of treatment depends on the severity of the microbiological problem. *For best results the system should be cleaned prior to treatment.*

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BULAB 3849

Product/Use Information Sheet PETROLEUM SECONDARY RECOVERY

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole.....	8.0%
Methylene bis(thiocyanate).....	8.0%
INERT INGREDIENTS:.....	84.0%

Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water-soluble bags for the purpose of providing application convenience and increased safety to the end user. These bags are further packaged in water-resistant enclosures that are designed to protect the water-soluble bags and keep them dry. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure. Application dosages are recommended to take advantage of available package sizes thus allowing use of the total contents of each bag. The bags should be placed in the system in an area of good flow to ensure adequate dispersion.

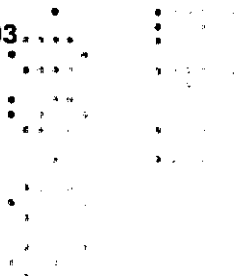
NEVER OPEN INDIVIDUAL BAGS, INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER WHEN NOT IN USE.

PETROLEUM SECONDARY RECOVERY (1pound bags): BULAB 3849 is used to control sulfate-reducing bacteria, slime-forming bacteria and fungi in oilfield water, polymer, or micellar floods, water-disposal systems, and other oilfield water systems at dosage rates of **1 to 4 1-lb bag(s) of BULAB 3849 per 4000 gallons of water treated.** Additions should be made continuously or intermittently by means of a metering pump at the free water knockouts, before or after injection pumps and injection well headers. **Intermittent of Slug Method:** When system is noticeably fouled, or to maintain control, add **1 to 4 1-lb bag(s) of BULAB 3849 per 1000 gallons of water 1 to 4 times per week,** or as needed to maintain control.

PETROLEUM SECONDARY RECOVERY: (4 ounce bags) BULAB 3849 is used to control sulfate-reducing bacteria, slime-forming bacteria and fungi in oil-field water, polymer, or micellar floods, water-disposal systems, and other oil-field water systems at dosage rates of **1 to 4 - 4 oz bag(s) of BULAB 3849 per 1000 gal of water treated.** Additions should be made continuously or intermittently by means of a metering pump at the free water knockouts, before or after injection pumps and injection well headers. **Intermittent of Slug Method:** When system is noticeably fouled, or to maintain control, add **1 to 4 - 4 oz bag(s) of BULAB 3849 per 1000 gal of water 1 to 4 times per week,** or as needed to maintain control.

EPA Reg. No.: 1448-408

Revised 6/5/03



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BULAB 3849

Product/Use Information Sheet DRILLING, FRACTURING, AND REWORK FLUIDS

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole.....8.0%

Methylene bis(thiocyanate).....8.0%

INERT INGREDIENTS:.....84.0%

Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water-soluble bags for the purpose of providing application convenience and increased safety to the end user. These bags are further packaged in water-resistant enclosures that are designed to protect the water-soluble bags and keep them dry. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure. Application dosages are recommended to take advantage of available package sizes thus allowing use of the total contents of each bag. The bags should be placed in the system in an area of good flow to ensure adequate dispersion.

NEVER OPEN INDIVIDUAL BAGS. INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER WHEN NOT IN USE.

DRILLING, FRACTURING, AND REWORK FLUIDS (1 pound bags): To inhibit bacterial and fungal degradation of the fluids or muds used in the drilling, fracturing and rework of oil wells, BULAB 3849 is incorporated in the drilling fluid at concentrations of 4 to 24 1-lb bag(s) of BULAB 3849 per 1000 gallons of fluid.

DRILLING, FRACTURING, AND REWORK FLUIDS (4ounce bags): To inhibit bacterial and fungal degradation of the fluids or muds used in the drilling, fracturing and rework of oil wells, BULAB 3849 is incorporated in the drilling fluid at concentrations of 16 to 96 4-oz bag(s) of BULAB 3849 per 1000 gallons of fluid.

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BULAB 3849

Product/Use Information Sheet SAPSTAIN AND MOLD CONTROL

ACTIVE INGREDIENTS:

2-(Thiocyanomethylthio)benzothiazole.....	8.0%
Methylene bis(thiocyanate).....	8.0%
INERT INGREDIENTS:.....	84.0%

Please refer to the product label for precautionary statements regarding use and handling of this product.

BULAB 3849 is packaged in water soluble bags for the purpose of providing application convenience and increased safety to the end user. Careful handling of the product should maintain product integrity and will reduce likelihood of exposure.

NEVER OPEN INDIVIDUAL BAGS, INDIVIDUAL BAGS SHOULD ALWAYS BE STORED IN THEIR ORIGINAL CONTAINER.

SAPSTAIN AND MOLD CONTROL (1 pound bags): BULAB 3849 is used to control sapstain and mold on freshly cut hardwood and softwood lumber, logs, poles, posts and timbers. It is applied by dipping or spraying the wood until complete surface wetting is accomplished. **Use 6 to 24 1-lb(s) bags of BULAB 3849 per 100 gallons of water** and agitate vigorously until BULAB 3849 is thoroughly dispersed. Rates to be used will vary according to temperature, humidity, wood moisture, storage conditions, etc. Under conditions suitable for aggressive mold growth, the high rate mentioned above should be used. Treatment should be made as quickly as possible after lumber is cut and always within 24 hours after cutting.

