

1448-432

06/14/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 14 2010

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

Subject: **BCMW**  
EPA Registration Number 1448-432  
Application Dated March 16, 2010  
EPA Received Date March 17, 2010

Dear Mr. Watson:

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

**Proposed Amendment:**

- Revise the Storage & Disposal Section PR Notice 2007-4

**General Comments:**

Revise label as follows:

- 1.) Revise the "Container Disposal" heading on page 2 to read "Container *Handling*."
- 2.) The nonrefillable container text must be consolidated for clarity by stating the following:

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) and promptly after emptying. Then offer for recycling or reconditioning, if available. If not, puncture and dispose of in sanitary landfill, or if allowed by state and local authorities by burning. If burned, stay out of smoke. If metal container, do not puncture or burn.

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

(Residue Removal for <5 gallons): Proposed Language is acceptable.  
(Residue Removal for > 5 gallons): Proposed Language is acceptable.

3.) Delete the last three statements under "Storage and Disposal" because they are repetitive. These statements are the Environmental Hazards statements which already appear on page 1.

4.) You must revise the second statement under the "Directions for Use" such that the use sites are consistent with those listed on the end-use product, Busan 1215, by stating *"This product is for formulating Use Only into EPA registered antimicrobial products for the following uses: Industrial processes and water systems -Pulp and Paper Mills, Recirculating Cooling Water Systems, Evaporative Condensers, Brewery and Food Pasteurizers, Seawater Desalination and Reverse Osmosis Systems, Sewage and Wastewater Systems, Non-Fish containing Decorative Fountains and Ponds, Seawater and Freshwater Influent Systems, Paint Spray Booth Sumps, and Air Washers"*.

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224.

Sincerely,  
*Drusilla Copeland*  
for Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

Enclosure: stamped label

**ACTIVE INGREDIENT(S)**

Ammonia (total).....

7.59%

**INERT INGREDIENTS**.....

92.41%

**TOTAL**.....

100.00%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

FIRST AID	
If in Eyes	<ul style="list-style-type: none"> <li>- Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>- Call a poison control center or doctor for further treatment advice.</li> </ul>
If on Skin, Clothes	<ul style="list-style-type: none"> <li>- Take off contaminated clothing.</li> <li>- Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>- Call a poison control center or doctor for treatment advice.</li> </ul>
If Swallowed	<ul style="list-style-type: none"> <li>- Call poison control center or doctor immediately for treatment advice.</li> <li>- Have person sip a glass of water, if able to swallow.</li> <li>- Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>- Do not give anything by mouth to an unconscious person.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>- Move person to fresh air.</li> <li>- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.</li> <li>- Call a poison control center or doctor for further treatment advice.</li> </ul>
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 901-767-2722 for emergency medical treatment information.	

### Precautionary Statements

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed. Avoid breathing vapor. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

**ENVIRONMENTAL HAZARDS:** 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.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUN 14 2010

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,

registered under EPA Reg. No. 1448-432

## Storage and Disposal

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

**PESTICIDE STORAGE:** Keep container tightly closed. Store in a dry place. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** 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 Hazardous Waste representative at the nearest EPA Regional office for guidance. Clean equipment and/or dispose of equipment wash water in a manner to avoid contamination of water resources. .

### 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. **Plastic Containers:** May be incinerated, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **Metal Containers:** Must not be incinerated. Do not cut or weld on or near metal containers.

{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 ¼ 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. 1448-432

Product Weight 9.59 lbs/gal 1.15kg/l

Net contents are marked on the container.

### HMIS / NPCA Ratings

Health 1 Flammability 1 Reactivity 0

Last Revision

3/5/2010

# BCMW

5/5  
**Buckman**

## **Directions for Use**

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

**This product is for FORMULATING USE ONLY into EPA registered antimicrobials for the following use:  
Pulp and Papermills.**

**Formulators are responsible for obtaining registrations and preparing labeling in compliance with  
EPA guidelines for formulations based on this product.**