

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

June 15, 2005

Kristin M. Miller  
Regulatory Affairs Specialist  
Buckman Laboratories, Inc.  
1256 N. McLean Blvd.  
Memphis, TN 38108

Subject: Busan 1125C  
EPA Registration No. 1448-20001  
Application Date: May 13, 2005  
Receipt Date: May 17, 2005

Dear Ms. Miller:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

- addition of alternate brand name "BULAB 3846C"

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Y. Henson  
Product Reviewer (32)  
Regulatory Management Branch II  
Antimicrobials Division (7510C)

**CONCURRENCES**

SYMBOL	7510C	7510C						
IRNAME	E. Berg	Mitchell						
DATE	6/15/05	6-15-05						

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

<b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration	OPP Identifier Number
		<input type="checkbox"/> Amendment	
		<input checked="" type="checkbox"/> Other	

**Application for Pesticide - Section I**

1. Company/Product Number 1448-20001	2. EPA Product Manager W. Mitchell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) BUSAN 1125C	PM# PM-32	
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 to add alternate trade name BULAB 3846C to BUSAN 1125C. This action qualifies for Fast Track review and therefore is not subject to the Pesticide Registration Improvement Act (PRIA) fees or timeframes. This action is subject to standard to FIFRA 3(h) timeframes (30) days.

**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 be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information Label _____ Container _____		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" 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 Kristin M. Miller	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) (901) 272-6770
<b>Certification</b> 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 Regulatory Affairs Specialist	
4. Typed Name Kristin M. Miller	5. Date May 13, 2005	

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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

Via Federal Express

May 13, 2005

Emily Mitchell, PM-32  
US Environmental Protection Agency  
Regulatory Management Branch II  
Antimicrobials Division (7510C)  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Hwy  
Arlington, VA 22202

Re: Busan 1125C, EPA Reg. No. 1448-20001  
Label Notification for Alternate Trade Name

Dear Ms. Mitchell:

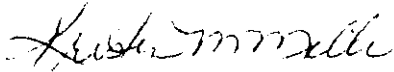
Buckman Laboratories, Inc. requests that the trade name, **BULAB 3846C** be added to the file for BUSAN 1125C (EPA Reg. No. 1448-20001). The labeling for **BULAB 3846C** shall be identical to that for BUSAN 1125C, with the exception of trade name.

Please find enclosed five (5) labels for your review. This action is considered to qualify as a Fast-Track Amendment and therefore is not subject to the Pesticide Registration Improvement Act (PRIA) fees or timeframes. This action is subject to standard FIFRA 3(h) timeframes (30 days).

If you have any questions or require any additional information, please feel free to contact me at (901) 272-6770.

Sincerely,

BUCKMAN LABORATORIES INTERNATIONAL, INC.



Kristin M. Miller  
Regulatory Affairs Specialist





# BULAB 3846C

BULAB is a registered trademark.

## ACTIVE INGREDIENT(S)

Sodium hypochlorite	12.5%
INERT INGREDIENTS	87.5%
TOTAL	100.0%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

### 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 901-278-0330 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, may cause severe skin and eye irritation or chemical burns to broken skin. Causes eye damage. Wear safety glasses or goggles and rubber gloves when handling this product. Wash after handling. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until strong odors have dissipated.

#### PHYSICAL AND CHEMICAL HAZARDS:

**STRONG OXIDIZING AGENT:** Mix only with water according to label directions. Mixing this product with chemicals (e.g. ammonia, acids, detergents, etc) or organic matter (e.g. urine, feces, etc) will release chlorine gas which is irritating to eyes, lungs and mucous membranes.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination Systems (NPDES) permit. 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.

NOTE: This product degrades with age. Use a chlorine test kit and increase dosage as necessary to obtain the required level of chlorine.

**PULP AND PAPER MILL PROCESS WATER SYSTEMS:**

**SLUG FEED METHOD - Initial Dose:** When system is noticeably fouled, apply 52 to 104 of this product per 10,000 gallons of water in the system to obtain from 5 to 10 ppm available chlorine. Repeat until control is achieved.

**Subsequent Dose:** When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system daily or as needed to maintain control and keep the chlorine residual at 1 ppm. Badly fouled systems must be cleaned before treatment is begun.

**INTERMITTENT FEED METHOD - Initial Dose:** When the system is noticeably fouled, apply 52 oz. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. Apply half (1/3, 1/4, 1/5) of the initial dose when half (1/3, 1/4, 1/5) of the water has been lost by blowdown.

**Subsequent Dose:** When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system to obtain a 1 ppm residual. Apply half (1/3, 1/4, 1/5) of the initial dose when half (1/3, 1/4, 1/5) of the water has been lost by blowdown. Badly fouled systems must be cleaned before treatment is begun.

**CONTINUOUS FEED METHOD - Initial Dose:** When system is noticeably fouled, apply 52 to 104 oz. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine.

**Subsequent Dose:** Maintain this treatment level by starting a continuous feed of 1 oz. of this product per 1000 gallons of water lost by blowdown to maintain a 1 ppm residual. Badly fouled systems must be cleaned before treatment is begun.

**BRICQUETTES OR TABLETS - Initially slug dose the system with 52 oz. of this product per 10,000 gallons of water in the system. Badly fouled systems must be cleaned before treatment is begun.**

**Subsequent Dose:** When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system daily, or as needed to maintain control and maintain the chlorine residual at 1 ppm.

**COOLING TOWER/ EVAPORATIVE CONDENSOR WATER**

**SLUG FEED METHOD - Initial Dose:** When system is noticeably fouled, apply 52 to 104 of this product per 10,000 gallons of water in the system to obtain from 5 to 10 ppm available chlorine. Repeat until control is achieved.

**Subsequent Dose:** When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system daily or as needed to maintain control and keep the chlorine residual at 1 ppm. Badly fouled systems must be cleaned before treatment is begun.

**INTERMITTENT FEED METHOD - Initial Dose:** When the system is noticeably fouled, apply 52 oz. to 104 oz. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine. Apply half (1/3, 1/4, 1/5) of the initial dose when half (1/3, 1/4, 1/5) of the water has been lost by blowdown.

**Subsequent Dose:** When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system to obtain a 1 ppm residual. Apply half (1/3, 1/4, 1/5) of the initial dose when half (1/3, 1/4, 1/5) of the water has been lost by blowdown. Badly fouled systems must be cleaned before treatment is begun.

**CONTINUOUS FEED METHOD - Initial Dose:** When system is noticeably fouled, apply 52 to 104 oz. of this product per 10,000 gallons of water in the system to obtain 5 to 10 ppm available chlorine.

**Subsequent Dose:** Maintain this treatment level by starting a continuous feed of 1 oz. of this product per 1000 gallons of water lost by blowdown to maintain a 1 ppm residual. Badly fouled systems must be cleaned before treatment is begun.

**BRICQUETTES OR TABLETS - Initially slug dose the system with 52 oz. of this product per 10,000 gallons of water in the system. Badly fouled systems must be cleaned before treatment is begun.**

**Subsequent Dose:** When microbial control is evident, add 11 oz. of this product per 10,000 gallons of water in the system daily, or as needed to maintain control and maintain the chlorine residual at 1 ppm.

**DISINFECTION OF DRINKING WATER (EMERGENCY/PUBLIC/INDIVIDUAL SYSTEMS) PUBLIC SYSTEMS:** Mix a ratio of 1 oz. of this product to 100 gallons of water. Begin feeding this solution with hypochlorinator until a free available chlorine residual of at least 0.2 ppm and no more than 0.6 ppm is attained throughout the distribution system. Check water frequently with a chlorine test kit. Bacteriological sampling must be conducted at a frequency no less than that prescribed by the National Interim Primary Drinking Water Regulations. Contact your local Health Department for further details.

**INDIVIDUAL SYSTEMS: DUG WELLS:** Upon Completion of the casing (lining) wash the interior of the casing (lining) with 100 ppm available chlorine solution using a stiff brush. This solution can be made by thoroughly mixing 1 oz. of this product in to 10 gallons of water. After covering the well, pour the sanitizing solution into the well through both the pipe sleeve opening and the pipeline. Wash the exterior of the pump cylinder also with the sanitizing solution. Start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine have been removed from water. Consult your local Health Department for further details.

**INDIVIDUAL SYSTEMS: DRILLED, DRIVEN & BORED WELLS:** Run pump until water is as free from turbidity as possible. Pour a 100 ppm available chlorine sanitizing solution into the well. This solution can be made by thoroughly mixing 1 oz. of this product into 10 gallons of water. Add 5 to 10 gallons of clean, chlorinated water to the well in order to force the sanitizer into the rock formation. Wash the exterior of pump cylinder with the sanitizer. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine is have been removed from water. Deep wells with high water levels may necessitate the use of special methods for introduction of the sanitizer into the well. Consult your local health department for further details.

**INDIVIDUAL WATER SYSTEMS: FLOWING ARTESIAN WELLS:** Artesian wells generally do not require disinfection. If analyses indicate persistent contamination, the well should be disinfected. Consult your local health department for further details.

**EMERGENCY DISINFECTION:** When boiling water for 1 minute is not practical, water can be made potable by using this product. Prior to addition of the sanitizer, remove all suspended material by filtration or by allowing it to settle to the bottom. Decant the clarified, contaminated water to a clean container and add 1 drop of this product to 20 gallons of water. Allow the treated water to stand for 30 minutes. Properly treated water should have a slight chlorine odor, if not, repeat dosage and allow the water to stand an additional 15 minutes. The treated water can then be made palatable by pouring between clean containers several times.

**PUBLIC WATER SYSTEMS RESERVOIRS-ALGAE CONTROL:** Hypochlorinate streams feeding the reservoir. Suitable feeding points should be selected on each stream at least 50 yards upstream from the points of entry into the reservoir.

**MAINS:** - Thoroughly flush section to be sanitized by discharging from hydrants. Permit a water flow of at least 2.5 feet per minute to continue under pressure while injecting this product by means of a hypochlorinator. Stop water flow when a chlorine residual test of 50 ppm is obtained at the low pressure end of the new main section after 24 hour retention time. When chlorination is completed, the system must be flushed free of all heavily chlorinated water.

**NEW TANKS, BASINS, ETC.:** - Remove all physical soil from surfaces. Place 20 oz. of this product for each cubic feet of working capacity (500 ppm available chlorine). Fill to capacity and allow to stand for at least 4 hours. Drain and flush with potable water and return to surface.

**NEW FILTER SAND:** - Apply 80 oz of this product for each 150 to 200 cubic feet of sand. The action of the product dissolving as the water passes through the bed will aid in sanitizing the new sand.

**NEW WELLS:** - Flush the casing with 50 ppm available chlorine solution of water containing 5 oz. of this product for each 100 gallons of water. The solution should be pumped by gravity into the well after thorough mixing with agitation. The well should stand for several hours or overnight under chlorination. It may then be pumped until representative raw water sample is obtained. Bacterial examination of the water will indicate whether further treatment is necessary.

**EXISTING EQUIPMENT:** - Remove equipment from service, thoroughly clean surfaces of all physical soil. Sanitize by placing 21 oz. of this product for each 5 cubic feet capacity (approximately 500 ppm available chlorine). Fill to working capacity and let stand at least 4 hours. Drain and place in service. If the previous treatment is not practical, surfaces may be sprayed with a solution containing 5 oz. of this product for each 5 gallons of water (approximately 1000 ppm available chlorine). After drying, flush with water and return to service.