



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 21, 2003

Kevin J. Archer
Product Development Manager
CSI
One Woodlawn Green, Suite 250
Charlotte, NC 28217

Subject: **ACQ 2100**
EPA Registration No. 10465-37
Application Dated September 28, 2003

Dear Mr. Archer:

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

Proposed Label Amendment

Label revisions per PR Notice 2001-1

Label Comments

- 1. Under the Storage and Disposal section add the sub-heading "Pesticide Storage and the appropriate text. Refer to PR Notice 83-3 for detailed information.

General Comments

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

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

Sincerely,

Renae A. Whitaker
Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Pesticides Division (7510C)

SYMBOL							
SURNAME	Enclosure						
DATE							

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes irreversible eye damage and skin irritation. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid inhalation of spray mist. Wear goggles or face shield, protective clothing and rubber gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters. Do not discharge into lakes, streams, ponds, or public waters, unless in accordance with a NPDES permit. Do not contaminate water by cleaning equipment or disposal of wastes. For guidance, contact your Regional Office of the Environmental Protection Agency.

ACQ 2100

Wood Preservative Concentrate

ACTIVE INGREDIENTS: (by weight)	
Copper ammonium carbonate.....	22.6%
Didecyl dimethyl ammonium chloride.....	4.7%
Inert Ingredients:.....	72.7%
TOTAL	100.0%
(copper oxide equivalent 9.4%)	

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

If swallowed: Call a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing: 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 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 treatment advice.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured by:
Chemical Specialties, Inc.
One Woodlawn Green
Charlotte NC 28217

EPA Reg. No. 10465-37
EPA Est. No. 10465-NC-1

Net contents _____ Gallons

DIRECTIONS FOR USE

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

GENERAL INFORMATION

ACQ 2100 is a formulation of copper oxide as copper ammonium carbonate and didecyl dimethyl ammonium chloride for the formulation of ammoniacal copper quat (ACQ) wood preservative solutions.

The contents are for use in commercial vacuum-pressure or spray application treatment systems for wood products. Wood products should only be treated with water dilutions ranging from 0.5% to 10.0% active ingredient(s) by weight. Impregnation procedures must rigidly adhere to applicable specifications of the American Wood Preservers' Association. Treated wood is provided protection against termites and wood decay fungi.

Note: Do not use in contact with brass, bronze or copper.

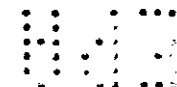
SPECIFIC USE INSTRUCTIONS

Refer to attached mixing instructions in Technical bulletin.

ACCEPTED
with COMMENTS
EPA Letter Dated:

NOV 21 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 10465-37



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SAFE HANDLING PROCEDURES

Do not attempt to use without implementing the necessary safety equipment. Applications must wear gloves impervious to wood treatment solutions in all situations where dermal contact is expected (i.e., handling freshly treated wood, manually opening cylinder doors, etc.).

Individuals who enter treatment cylinders and other related equipment contaminated with wood treatment solutions must wear protective clothing, (including: overalls, jacket, gloves, and boots), impervious to wood treatment solutions. In addition, individuals who enter treatment cylinders must wear properly fitting, well maintained, high-efficiency respirators that are MSHA/NIOSH-approved for ammonia. If plant levels of ammonia are unknown or exceed 35 ppm (STEL) or 25 ppm (ACGIH) of air averaged over an 8-hour work period, air monitoring programs, procedures, and record retention and submission must be conducted in accordance with OSHA Standards.

Applicators must not eat, drink, or use tobacco products during those parts of the applications process that may expose them to the wood treatment concentrate or solutions (i.e., manually opening or closing cylinder doors, moving trams out of the cylinder, mixing chemicals, handling freshly treated wood, etc.).

Wash thoroughly after skin contact and before eating, drinking, using tobacco products, or using restrooms.

Protective clothing must be removed when it shows signs of significant contamination. Applications must leave all protective clothing, work shoes or boots, and equipment at the treatment plant. Worn out or severely contaminated protective clothing must be disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.

Refer to the ACQ 2100 Material Safety Data Sheet for additional health and safety information.

STORAGE AND DISPOSAL

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

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 according to label instructions, contact your state Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: 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.

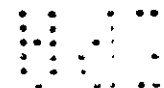
CONDITIONS OF SALE AND WARRANTY

Seller warrants that this product conforms to the standard specifications set forth on this label. SELLER MAKES NO OTHER REPRESENTATIONS OR WARRANTIES OF ANY KIND, AS TO THE MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE, OR ANY OTHER MATTER WITH RESPECT TO THIS PRODUCT WHETHER USED ALONE OR IN COMBINATION WITH ANY OTHER MATERIAL. BUYER ASSUMES ALL RISKS TO PERSONS OR PROPERTY ARISING OUT OF THE USE OR HANDLING AND ACCEPTS THE PRODUCT SUBJECT TO THE CONDITIONS SET FORTH ON THIS LABEL. BECAUSE TIME, GEOGRAPHICAL LOCATION, RATE OF APPLICATION, AND OTHER CONDITIONS ARE BEYOND SELLER'S CONTROL, SELLER'S LIABILITY FOR ANY LOSS OR DAMAGES ARISING OUT OF ANY CAUSE INCLUDING STORAGE, HANDLING, AND USE OF THIS PRODUCT SHALL IN NO EVENT EXCEED THE PURCHASE PRICE OF THE PRODUCT, IN RESPECT TO WHICH SUCH CAUSE ARISES OR AT THE SELLER'S OPTION THE REPLACEMENT OF SUCH PRODUCT AND IN NO EVENT SHALL SELLER BE LIABLE FOR INCIDENTAL, SPECIAL, CONSEQUENTIAL, OR PUNITIVE DAMAGES RESULTING FROM ANY CAUSE. No claim for any cause whatsoever shall be allowed unless Buyer gives Seller prompt written notice thereof. Failure to commence action with respect to such claim within one year from the date of delivery of ACQ for which a claim is alleged, shall constitute a waiver by Buyer of any such claim.

ACCEPTED
with COMMENTS
EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 10465-37



ACQ Mixing Table
To Mix 1000 Gallons of Solution

% Solution	Gallons ACQ Conc.	Gallons Water	% Solution	Gallons ACQ Conc.	Gallons Water	% Solution	Gallons ACQ Conc.	Gallons Water
0.50%	31.1	968.9	3.70%	236.9	763.1	6.90%	455.4	544.6
0.60%	37.3	962.7	3.80%	243.5	756.5	7.00%	462.5	537.5
0.70%	43.6	956.4	3.90%	250.2	749.8	7.10%	469.5	530.5
0.80%	49.9	950.1	4.00%	256.8	743.2	7.20%	476.5	523.4
0.90%	56.2	943.8	4.10%	263.5	736.5	7.30%	483.7	516.3
1.00%	62.5	937.5	4.20%	270.2	729.8	7.40%	490.8	509.2
1.10%	68.8	931.2	4.30%	276.9	723.1	7.50%	497.9	502.1
1.20%	75.1	924.9	4.40%	283.6	716.4	7.60%	505.0	495.0
1.30%	81.4	918.6	4.50%	290.3	709.7	7.70%	512.2	487.8
1.40%	87.8	912.2	4.60%	297.0	703.0	7.80%	519.3	480.7
1.50%	94.1	905.9	4.70%	303.8	696.2	7.90%	526.5	473.5
1.60%	100.5	899.5	4.80%	310.5	689.5	8.00%	533.7	466.3
1.70%	106.9	893.1	4.90%	317.3	682.7	8.10%	540.9	459.1
1.80%	113.2	886.8	5.00%	324.1	675.9	8.20%	548.1	451.9
1.90%	119.6	880.4	5.10%	330.9	669.1	8.30%	555.3	444.7
2.00%	126.1	873.9	5.20%	337.7	662.3	8.40%	562.6	437.4
2.10%	132.5	867.5	5.30%	344.5	655.5	8.50%	569.8	430.2
2.20%	138.9	861.1	5.40%	351.3	648.7	8.60%	577.1	422.9
2.30%	145.4	854.6	5.50%	358.2	641.8	8.70%	584.4	415.6
2.40%	151.8	848.2	5.60%	365.1	634.9	8.80%	591.7	408.3
2.50%	158.3	841.7	5.70%	371.9	628.1	8.90%	599.0	401.0
2.60%	164.8	835.2	5.80%	378.8	621.2	9.00%	606.3	393.7
2.70%	171.3	828.7	5.90%	385.7	614.3	9.10%	613.6	386.4
2.80%	177.8	822.2	6.00%	392.6	607.4	9.20%	621.0	379.0
2.90%	184.3	815.7	6.10%	399.5	600.5	9.30%	628.4	371.6
3.00%	190.8	809.2	6.20%	406.5	593.5	9.40%	635.7	364.3
3.10%	197.4	802.6	6.30%	413.4	586.6	9.50%	643.1	356.9
3.20%	203.9	796.1	6.40%	420.4	579.6	9.60%	650.6	349.4
3.30%	210.5	789.5	6.50%	427.4	572.6	9.70%	658.0	342.0
3.40%	217.1	782.9	6.60%	434.4	565.6	9.80%	665.4	334.6
3.50%	223.7	776.3	6.70%	441.4	558.6	9.90%	672.9	327.1
3.60%	230.3	769.7	6.80%	448.4	551.6	10.00%	680.4	319.6