STATES ENVIRONMENTAL PROTECTION-AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

DEC 17 2009

OFFICE OF PREVENTION, PESTICIDI AND TOXIC SUBSTANCE

Julie Ownbey Arch Treatment Technologies Inc. 5660 New Northside Drive, Suite 1100 Atlanta, GA 30328

Subject:

F2 Concentrate

EPA Registration No. 74487-1

Application Date: September 15, 2009 Receipt Date: September 18, 2009

Dear Ms. Ownbey:

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

Proposed Amendment:

Update Container Language as per PR Notice 2007-4

Other Comment(s):

1. Storage and Disposal

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

Pesticide Storage: Store in cool, dry place. Open dumping is prohibited. Pesticide Disposal:

Container Disposal:

(5 gallons or less)

Nonrefillable Container. Do not refill or reuse container. Triple rinse as follows: Fill container ¼ full with water. Shake for 10 seconds. Empty the rinsate into the application equipment or mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

(5 gallons or more)

Nonrefillable Container. Do not refill or reuse container. Triple rinse as follows: Fill container 1/4 full with water. 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. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into the application equipment or mix tank or store rinsate

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- 2. 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.
- 3. You must revise your Precautionary Statement to read as follows:

FATAL IF INHALED, CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS. MAYBE FATAL IF SWALLOWED OR ABSORBED THROUGH THE SKIN.

Future labeling amendments may be accomplished by submitting a copy of the electronic label. Refer to the following website for guidance on electronic submissions, including label:http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm.

If you have any questions concerning electronic label submissions, please refer to the above website for a list of contact personnel for more information.

General Comment:

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6427 or by e-mail at carlisle sharon@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at grigsby.stacey@epa.gov during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely

ShaRon Carlisle

(Acting) Product Manager (34) Regulatory Management Branch II

Antimicrobials Division (7510P)

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F-2 CONCENTRATE

T2154 liquid Microbicide

INGREDIENT STATEMENT ACTIVE INGREDIENT:

KEEP OUT OF REACH OF CHILDREN

DANGER



POISON

FIRST AID

IF SWALLOWED: Call a Poison Control Center or doctor immediately for treatment advice. Have a 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 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.

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(s) open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue to rinse eye(s). Call a Poison Control Center or doctor for treatment advice.

Have the product container or label with you when you call a Poison Control Center or doctor, or when going for treatment. For Medical Emergencies: 800-654-6911 (24 hours a day).

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. This product is extremely toxic via the inhalation route.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA EST NO. 67471-BC-01

EPA Reg. No. 74487-1

ARCH WOOD PROTECTION CANADA CORP 2000 Argentia Rd., Plaza 4, Suite 306 Mississauga Ontario, L5N 1V9 905-826-9648 ACEAN 24-Hr. Emg. Resp. 800-654-6911

ACCEPTED With COMMENTS

EPA Letter Dated:

NET CONTENTS: 4,400 lbs

Under the Federal Insecticide,
Pungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 74487-1

DIRECTIONS FOR USE

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

Contains Disodium Octaborate Tetrahydrate Didecyldimethyl Ammonium Chloride. For use on whole logs, timber, lumber, and millwork.

General Instructions:

A delay in treatment of 24 hours or more permits the start of stain, mold, and decay growth on freshly cut wood. Freshly sprayed or dipped lumber should be protected from rainfalls. Dip tanks and drip aprons must be properly maintained.

Spray boxes must be equipped with mechanical means of preventing the escape of droplets or entrained aerosol.

Mixing Instructions:

Mix one gallon of F-2 Concentrate per four to six gallons of water for spray. Dipping may need a higher dilution. Contact Arch Wood Protection for recommendations. The operational target deposit of level of Didecyldimethyl Ammonium Chloride on the surface of treated lumber is 100 micrograms per square centimeter for saptstain control and up to 500 micrograms per square centimeter on Millwork and other wood for long term protection. The second level of protection provided by F-2 is Disodium Octaborate which is a proven fungicide and insecticide. The Boric Acid equivalent (BAE) of F-2 is 20.16%. Actual deposit levels should be verified periodically using available analytical techniques. Contact Arch Wood Protection for further information. Use part of the dilution water to rinse container, if applicable to reduce residue in container.

PHYSICAL AND CHEMICAL HAZARD

Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

PESTICIDE DISPOSAL: [For containers > 5 gallons] 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 by use 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 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. Turn the container over onto its other 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.

PESTICIDE DISPOSAL: [For containers < 5 gallons] 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 by use 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. Triple rinse as follows: Empty 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.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container promptly after emptying. 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.)

OR

(CONTAINER DISPOSAL: 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. To clean the container before final disposal, empty the remaining contents form this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or reciculate water with pump for 2 minutes. Pour or pump rinsate into application equipments or rinsate collection system. Repeat this rinsing procedure two more times.)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CONCENTRATE IS FATAL IF INHALED AND MAY BE HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN.

CORROSIVE: CAUSES IRREVERSIBLE EYE DAMAGE AND SEVERE SKIN BURNS.

Do not breathe spray mist. Wear respiratory protective device approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health and face shield. Wash thoroughly with soap and water after using. Remove contaminated clothing and wash before reuse. Use only in well ventilated areas. Do not wear contact lenses.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- A NIOSH-approved respirator with an ammonia, organic, and HEPA cartridge such as P-100
- Coveralls over long-sleeved shirt and long pants
- Socks and chemical resistant footwear
- Goggles or face shield
- Chemical-resistant gloves (such as: Barrier Laminate or viton)

USER SAFETY REQUIREMENTS & RECOMMENDATIONS

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 exist for washables, use detergent and hot water. Keep and wash PPE separate 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. User should remove personnel protective equipment immediately after handling this product. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS

Pesticide wastes are acutely hazardous. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate. 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. Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.