



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

MAY - 3 2010

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Thomas J. Parshley
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419

Subject: **Propi-Shield™**
EPA Registration No. 100-1233
Application Date: April 21, 2009
Receipt Date: April 22, 2009

Dear Mr. Parshley:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 3 (c) 7 A as amended, is acceptable with conditions.

Proposed Amendment:

- Increase in rates for Paints and Stains

Data Summary

Data Requirement	Means of Support	Status
Dermal Penetration Study (in vivo)	Submitted study, MRID 477365-03	Acceptable, Dermal Absorption Factor 1% and 26.6% for 10 hour exposure for paints and stains only.

The Occupational and Residential Exposure Assessment identified the following risks:

The calculated maximum rate of exposure (MOE) for the short-term dermal exposure for the professional applicator applying stain using an airless sprayer is below the target MOE of 100 (MOE=52) and is at a level of concern.

The calculated MOE for the short-term dermal exposure for the homeowner applicator applying stain using an airless sprayer is below the target MOE of 100 (MOE=80) and is a level of concern.

However, the restrictive statements "do not use airless sprayer" and "apply wood preservative or wood preservative stain by brush, roller or low pressure hand wand (LPHW)", must be added to the "Penetrating Wood Preservatives and Wood Preservative Stains" directions to mitigate the risks outlined above.

CONCURRENCES

SYMBOL	SURNAME	DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Conditions:

Revise the label as follows:

Revise the "Penetrating Wood Preservatives and Wood Preservative Stains" directions on page 8 by adding the statement "do not use airless sprayer to apply wood preservative or wood preservative stain."

The Agency interprets the "Penetrating Wood Preservatives and Wood Preservative Stains" directions on page 3 to indicate that this product would be poured into another container either a wood preservative or wood preservative stain. The container receiving your product would not have labeling to direct handlers to refrain from applying with an airless sprayer. Therefore, you must reduce the rate for the active ingredient concentration levels in the "Penetrating Wood Preservatives and Wood Preservative Stains" directions from 0.8% to 0.4% to lower the risk to occupational and residential handlers.

General Comments

A stamped label with conditions is enclosed. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3 (c) (5) and section 4 (a) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6 (e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Should you have any questions concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by email at grigsby.stacey@epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline McFarlane

Jacqueline McFarlane
(Acting) Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY - 3 2010

Propi-Shield™

Preservative For Industrial and Commercial Use

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. *100-1233*

Active Ingredient:

Propiconazole (CAS No. 60207-90-1) 41.8%

Other Ingredients* 58.2%

Total: 100.0%

Contains 3.6 lbs. active ingredient/gallon.

*Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

WARNING/AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-1233

EPA Est.

SCP 1223A

Net Contents

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • 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 on skin or clothing	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not give any liquid to the person. • 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	<ul style="list-style-type: none"> • 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.
NOTE TO PHYSICIAN	
Contains petroleum distillates – vomiting may cause aspiration pneumonia.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOTLINE NUMBER	
For 24-Hour Medical Emergency Assistance (Human or Animal) Or Chemical Emergency Assistance (Spill, Leak, Fire or Accident) Call 1-800-888-8372	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING/AVISO

Causes substantial but temporary eye injury. Do not get in eyes, on skin, or on clothing. Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Wear chemical-resistant gloves (such as barrier laminate or butyl nitrile/neoprene rubber, PVC, viton at >14 mils.), and a chemical-resistant apron when mixing/loading.

Environmental Hazards

This pesticide is toxic to fish. 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 authorities are 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.

Physical or Chemical Hazards

Do not use, pour, spill, or store near heat or open flame.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, INC. or Seller. To the extent permitted by applicable law, Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to or beyond the control of Seller or Syngenta, and, (2) Buyer and User assume the risk of any such use. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.**

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

DIRECTIONS FOR USE

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

SAP STAIN AND MOLD CONTROL

Propi-Shield is used to control sap stain and mold on freshly cut hardwood and softwood lumber, poles, posts, timbers and other manufactured wood products. Examples of other wood products include:

Logs

Fungal staining can be inhibited in freshly debarked logs used for log home construction, export and yarding prior to sawing and other purposes.

Engineered Wood and Wood Furnishes

Engineered wood composites such as particle board, wafer board, oriented strand board and similar products can be protected from fungal discoloration during storage by treatment with Propi-Shield.

Wood Chips/Sawdust

Treatment of wood chips, sawdust or other products intended for papermaking (not for food grade/food contact paper or paperboard) reduces fungal discoloration and lowers bleaching requirements for finished paper products.

Plywood Veneer

Treatment with Propi-Shield is effective for freshly peeled green veneer and other similar plywood furnish that can be especially subject to stain and mold development that can interfere with appearance or laminating adhesive performance.

Propi-Shield is applied by dipping or spraying the wood until complete wetting is achieved. For bulk dip tanks Propi-Shield is diluted by using 0.08 to 0.58 gallons in 100 gallons of water (0.6 to 4.6 gallons Propi-Shield in 800 gallons water). Agitate vigorously until completely dispersed. For conventional spray systems a 0.14 to 1.13% Propi-Shield spray solution is used. For example, in a 100-gallon day tank, 0.14 to 1.13 gallons of Propi-Shield is added to the day tank and then enough water is added to bring the total volume up to 100 gallons of solution. In electrostatic spray applications Propi-Shield dilution is not required; treatment strength is varied by number of application nozzles used and line speed. Rates for all applications used will vary according to temperature, humidity, wood moisture, storage conditions, etc. Contact your local Propi-Shield product representative for application advice.

Remove sawdust and other debris for treating solution on a regular basis to maintain correct concentration of Propi-Shield in the application solution. To prevent fungal attack below the surface of the wood, freshly sawn lumber should be treated within 24 hours. Treated lumber should be protected from rain and removed from direct soil/ground contact.

Treated lumber must be stored under cover, indoors, or at least 100 feet from any pond, lake, stream, wetland, or river to prevent possible runoff of the product into the waterway. Treated lumber stored within 100 feet of a pond, lake, stream, wetland, or river must be either covered with plastic or surrounded by a berm to prevent surface water runoff into the nearby waterway. If a berm or curb is used around the site, it should consist of impermeable material (clay, asphalt, concrete) and be of sufficient height to prevent runoff during heavy rainfall events.

DECAY AND STAIN PROTECTION

Description

Propi-Shield is a wood preservative concentrate which requires dilution with water prior to use on wood products to protect against decay (brown and white rot) and staining fungi (blue stain).

Treated wood shall not be used in the construction of beehives.

Product Uses

For application to millwork, shingles and shakes, siding, plywood, and structural timber and composites that are used in above ground applications only. Do not use on wood which will come in contact with food.

Wood Preparation

Machine, cut, glue, and sand wood as desired before treating. Do not use over previously finished or stained wood without stripping off old finish. Wood must be clean and dry before treatment. Wood for pressure treatment should be kiln dried or air seasoned to a moisture content of about 25% or less to permit adequate penetration of preservative during treatment.

Treatment

Apply by immersion, roller coater, flood, spray, brush or pressure treatment process (double vacuum, full-cell or modified full-cell). For non-pressure application methods, mix 1.2 to 2.3 gallons of Propi-Shield with water to achieve 100 gallons of treating solution at the concentration of 0.5 to 1% active ingredient, respectively. Wood

products to be treated by the bundle-dipping process should be completely immersed for three (3) minutes. Individual wood pieces treated by immersion, roller-coater or flood shall be treated for not less than fifteen (15) seconds. Coverage for brush and spray applications is approximately 150 square feet per gallon of treating solution, but varies by the species and condition of the wood. Pressure treatment should be performed according to the methods described in the American Wood Preservers' Association (AWPA) standards. A minimum propiconazole retention level of 0.025 pounds per cubic foot (pcf) is recommended. All treated wood must be held on the drip pad until drippage has stopped. Any surface cut after first treatment should be retreated using 1% a.i. concentration solution.

Finishing

Before glazing, staining, painting, varnishing or application of water repellents, treated wood should be completely dry and odor free. For non-pressure applications allow 4-8 hours drying time under average temperature and humidity conditions; treated wood can be heat dried for plant production. Pressure treated wood requires drying time after treatment to a moisture content suitable to the type of coating to be applied.

Cleanup

Use water to remove wet Propi-Shield wood preservative from all surfaces, brushes and rollers.

COOLING TOWER WOOD

Use Propi-Shield to protect cooling tower wood against surface rot and internal or dry rot. Apply by spraying or painting a solution containing 0.28 to 0.62% Propi-Shield in water onto the clean wood surfaces. The amount applied should provide 0.13 to 0.26 pounds Propi-Shield per 1000 sq. ft. of wood surface. Surface rot can also be inhibited by periodic shock dose of Propi-Shield to the recirculating cooling water at the tower basin or cold well. The dosage should provide 0.96 pounds of Propi-Shield per 1000 gallons of water and the bleed off should be stopped for 4 to 6 hours after treatment. The shock treatment should be repeated every four months.

IN-CONTAINER PRESERVATIVE USES FOR FILM-FORMING COATINGS AND BUILDING MATERIALS

Propi-Shield provides control of fungi causing stain, odor, degradation of physical properties, and/or product degradation when used as an in-container preservative at levels between 0.11 to 3.0% (0.05 to 1.25% propiconazole), based on the total weight of the coating or building material such as mastics, caulks, joint cements, sealants, spackling, patching compounds, grouts, adhesives or emulsions and slurries used in their manufacture.

IN-CONTAINER PRESERVATIVE USES FOR PENETRATING (SOLVENT-BASED) STAINS

Propi-Shield provides control of fungi causing discoloration, odor, degradation of physical properties, and/or product degradation when used as an in-container preservative at levels between 0.11 to 0.8% (0.05 to 0.4% propiconazole), based on the total weight of the penetrating stain.

DRY FILM PRESERVATIVE FOR COATINGS AND BUILDING MATERIALS

Propi-Shield provides control of mold and mildew fungi causing stain, odor, or film degradation when used as a dry film preservative at levels between 0.11 to 2.75% (0.05 to 1.25% propiconazole), based on the total weight of the coating or building materials, such as mastics, caulks, joint cements, sealants, spackling, patching compounds, joint compounds, grouts, and adhesives.

PENETRATING WOOD PRESERVATIVES AND WOOD PRESERVATIVE STAINS

Propi-Shield provides control of decay and stain fungi on wood treated at levels between 0.56 to 1.9% (0.25 to 0.8% propiconazole), based on the total weight of the wood preservative or wood preservative stain.

Preserved stain can be applied by brush, roller, or low pressure hand wand (LPHW).

PAPER, WALLBOARD (DRY WALL AND GYPSUM BOARD) AND PAPERBOARD PRODUCTS

Propi-Shield will inhibit fungal mold and mildew growth which causes discoloration, odor and degradation in paper, wallboard, and paperboard. Apply with thorough agitation.

Propi-Shield can be added to the wet end of a paper machine at rates such that 0.1 to 2.5 pounds active ingredient are retained per ton of dry fiber. Alternatively, application may be made at the size press, water box, or dry end of the paper machine at rates such that 0.1 to 2.5 pounds active ingredient are retained per ton of dry paper.

Regardless of application method, the maximum rate of application shall be such that not more than 2.5 pounds active ingredient are retained per ton of dry paper. Propi-Shield may be applied to the gypsum core of wallboard to inhibit the growth of fungi. Apply 0.05 to 0.60 pounds of active ingredient per 1000 pounds of formulation, i.e., wet slurry. Propi-Shield cannot be applied to paper or paper products that come into contact with food.

CEILING TILES

To inhibit the growth of fungi in ceiling tiles and in mineral-based building materials used in the manufacture of ceilings, add 0.5 to 4.25 pounds of active ingredient per 1000

pounds of formulation (i.e., wet slurry). Propi-Shield can be added at any time during the formulation procedure.

RUBBER AND PLASTIC PRODUCTS

Propi-Shield will control mold and mildew on rubber and plastic products such as curtains, bath mats, and thermoplastic rubber. Propi-Shield may be added at rates from 0.1 to 0.5% active ingredient by weight. The temperature stability of Propi-Shield may be influenced by the choice of heat stabilizer and plasticizer in the formulation. Testing should be done to confirm compatibility of Propi-Shield with specific rubber or plastic products.

CAULKS, SEALANTS, ADHESIVES, BINDERS, AND INKS

Propi-Shield should be used at levels between 0.11 and 2.8% based on the weight of the formulation to inhibit fungal disfigurement and deterioration. Sufficient mixing to ensure adequate dispersion of the biocide is required. For solvent-based formulations Propi-Shield can be dissolved into aromatic solvents or combinations of aromatic and aliphatic solvents and added in the letdown or added directly to the finished product. For water thinned latex emulsions formulations Propi-Shield can be premixed with the wetting agent and added to the pigment slurry or simply added to the letdown or finished product.

METAL WORKING FLUIDS

Use Propi-Shield to inhibit fungal degradation of water based and water emulsifiable cutting fluids and coolants used in metalworking operations. Add Propi-Shield to the fluid concentrate or to the diluted metalworking fluid in an amount which will provide 50 to 700 ppm active ingredient in the diluted fluid.

TEXTILES, FABRICS, CANVAS AND CORDAGE

For the control of odor and stain causing microorganisms in textiles of the following products: shower curtains, carpet backing, awnings, boat covers, canvas, cordage, tents, tarpaulins, and wall coverings.

Addition of up to 2000 ppm of this active ingredient (4784 ppm of product) based on weight of goods can inhibit the growth of mold and mildew that causes stains, odors and product degradation in textiles, fabrics and fibers composed of acrylic, acrylonitrile butadiene, styrene, natural fibers (cotton, paper, wood, etc.), nitrile copolymers, nylon, polyester, polyethylene, polypropylene, rayon, rubber (natural and synthetic), coatings/finishes composed of silicone, urethane or vinyl applied to such materials. These materials should be added at an appropriate manufacturing step to ensure adequate mixing and complete uniform coverage of the treated material. Product can be applied by dye incorporation, pad, exhaust, or spray application.

STORAGE AND DISPOSAL

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

Pesticide Storage

Store in the original container in cool place.

Pesticide Disposal

Wastes may be toxic. Improper disposal of excess product, 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 of the nearest EPA Regional Office for guidance.

Container Handling

Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container (or equivalent) promptly after emptying. 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. 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. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONTAINER IS NOT SAFE FOR FOOD, FEED, OR DRINKING WATER.

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For non-emergency (e.g. current product information) call
Syngenta Crop Protection at 1-800-334-9481.

Manufactured for:
Syngenta Crop Protection, Inc.
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Greensboro, North Carolina 27419-8300

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