

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 1997

IBC Manufacturing Company
5966 Heisley Road
Mentor, OH 44060

Attention: Sangeeta V. Khattar
Registrations Representative

Subject: Copper Napthenate WR
EPA Registration Number 1022-409
Your Submission Dated March 20, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

- 1. Revise the Environmental Hazards to read as follows:

"This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA".

- 2. The net contents should be declared on the label or on the container.
- 3. Revise the ingredient statement as indicated below:

Active Ingredient	
Copper as metallic	2%
Inert Ingredients	98%
	100%

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

A stamped copy of your labeling is enclosed for your records. Submit one (1) copy of the final printed label prior to release of the product for shipment.

If you have any questions concerning this letter, please contact Delores Williams at (703) 308-6372.

Sincerely,



Robert S. Brennis
Acting Product Manager (32)
Regulatory Management Branch, II
Antimicrobials Division (7504C)

COPPER NAPHTHENATE WR

Wood Preservative

FOR EXTERIOR USE ONLY

Ready-to-Use

REPELS WATER, STOPS ROT - PAINTABLE
CONTROLS WARPING AND SWELLING
PROTECTS AGAINST INSECT ATTACK

Ingredient Statement

Active Ingredient:		
Copper as metallic	19.5%*	2%
Inert Ingredients:	80.5%	98%
Total:	100.0%	

*Equivalent to 2% metallic copper

MEETS FEDERAL SPECIFICATION TT-W-572 TYPE II, COMPOSITION C
Copper Naphthenate meets AWWA Specification P8

EPA Reg. No. 1022-409

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

WARNING

See Precautionary Statements.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 15 1997

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

1022-409

IBC Manufacturing Company
416 East Brooks Road
P.O. Box 9158
Memphis, TN 38109-0158

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS**WARNING**

Causes substantial but temporary eye injury. Harmful or fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid breathing spray mists or vapors. Wear goggles or face shield and rubber gloves when handling Copper Naphthenate WR.

DO NOT breathe vapors or mist during brush, roll, spray, and dip applications. Wear a NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of the product.

In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300.

Application of this product may produce strong, lingering, unpleasant odor.

FIRST AID**STATEMENT OF PRACTICAL TREATMENT**

IF IN EYES: Immediately flush with large quantity of water and get medical attention.

IF ON SKIN: Flush with water. Remove and wash contaminated clothing before re-use.

IF SWALLOWED: Do not induce vomiting. CALL A DOCTOR.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Do not store or use near heat or open flame.

DIRECTIONS FOR USE

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

Use only the application method specified for a particular use.

Products formulated or repackaged from this product must be labeled for "Exterior Use Only," and must bear all the statements listed under the section entitled Precautionary Statements and the formulator(s) or repackager(s) telephone number.

Apply ~~liberally~~ to all exterior wood surfaces exposed to moisture or weather. Make certain all areas are fully treated to get maximum benefits. Do Not apply on or near water, wetlands, or other areas where contamination of surface waters could occur.

Wood treated with COPPER NAPHTHENATE WR has a green color that fades slowly over time. Allow 24 hours or longer after application of the preservative prior to painting.

FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING

Wood should be free of bark, dry and well seasoned before treatment. Dip treatment is the most effective. A three minute immersion is adequate for most applications. Since a longer dip time achieves a higher retention of preservative in the wood, 12 to 48 hours immersion time is required for wood placed in contact with the soil, or used in construction of boats, piers, and other large wooden structures.

Brush, roller, or spray treatments are satisfactory for above ground applications, but should be used for ground contact applications only when dipping is not possible. In such cases, apply at least 2 ~~liberal coats~~ by brush, roller, or spray treatments, allowing at least 1 hour between each coat.

Rope and burlap should be dip soaked or sprayed until wet.

COVERAGE: One gallon covers 100 - 300 sq. ft. depending upon the wood species, porosity of the wood, and method of application.

RECOMMENDED USES

COPPER NAPHTHENATE WR is recommended for all wooden items in contact with either fresh or salt water, including boats, piers, and docks. Pretreatment only. Do not apply at sites on or near water or wetlands.

COPPER NAPHTHENATE WR may be applied to wood products such as landscape timbers, wooden seedling trays, plant and flower boxes for ornamental plantings.

COPPER NAPHTHENATE WR may also be used on windows, window frames, stairs, porches, steps, fence pickets, fence rails, ~~furring strips~~, and ropes.

Powderpost beetles and termites are killed by application of this preservative. These insects will not attack properly treated wood. Surfaces treated with COPPER NAPHTHENATE WR are non-toxic to plants and flowers.

Wood treated with Copper Naphthenate WR should not be used where it may come in contact with food, feed or potable water.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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.

GENERAL: Consult Federal, State or local disposal authorities for approved alternative procedures.

WARRANTY AND LIMITATION OF DAMAGES

Neither IBC Manufacturing Company nor the seller makes any representation or warranty, express or implied, concerning the use of this material, other than indicated on the label. Neither shall be held responsible in any manner for any personal injury or property damage or other type of loss resulting from improper handling, storage or use of this material. The buyer accepts and uses this material on these conditions.

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller that this product conformed to its chemical description and was reasonably fit for the purposes stated on the label when used in accordance with Seller's directions under normal conditions of use and directions. **SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO.** In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which a claim is made.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product, weather conditions, moisture conditions or other environmental conditions, and those conditions which are outside of the ranges that are generally recognized as being conducive to good application practice.

File: Special Review - CuNap Labels/Copper Naphthenate 1% RTU 1022-409

This label was revised in response to the review initiated by the Special Review Branch. The Naphthenate Salts Research Task Force decided not to pursue indoor uses for copper naphthenate. Sue Crescenzi hand delivered this revised label to Tom Moriarty of EPA on March 7, 1997.