

1022-409

7-22-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 22, 2003

Gail Early
Registrations Representative
IBC Manufacturing Company
416 E. Brooks Road
Memphis, TN 38109

Subject: Copper Naphthenate WR
EPA Registration No. 1022-409
Application Date: June 25, 2003
EPA Received Date: June 30, 2003

Dear Ms. Early:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide (FIFRA), as amended, is acceptable with the conditions listed below:

Proposed Amendment

- Update First Aid Statement per PR Notice 2001-1
- Update Warranty Statement

Conditions

Revise the label as follows:

1. Revise the Storage and Disposal Statements by deleting the heading "PROHIBITIONS."
2. Revise the Storage and Disposal Statements by creating Pesticide Storage instructions. Refer to PR Notice 83-3 for guidance.

CONCURRENCES

SYMBOL	7510C							
SURNAME	Shray							
DATE	7-22-03							

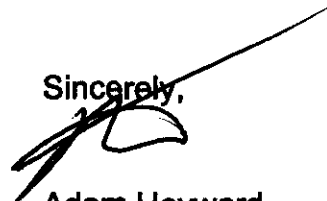
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General Comments

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

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



**Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)**

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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 Naphthenate25.0%*

Inert Ingredients:75.0%

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

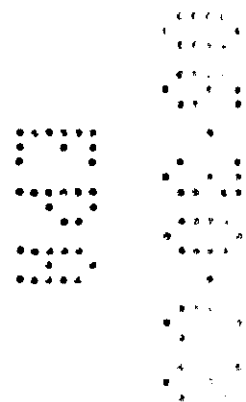
KEEP OUT OF REACH OF CHILDREN

WARNING

See Precautionary Statements.

ACCEPTED
with COMMENTS
EPA Letter Dated:

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



JUL 22 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1022-409

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	
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. ▪ 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 further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> ▪ 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 by a Poison Control Center or doctor. ▪ Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
<p>In case of emergency, call Chemtrec toll free at 800-424-9300. Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p>	

ENVIRONMENTAL HAZARDS

This product 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 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 Environmental Protection Agency

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 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 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.

SURFACES TO BE PAINTED LATER: Allow 48 hours before painting. Expect a slight discoloration after the first coat of white or light paint. Subsequent coats will be required to completely cover.

CLEAN UP: Clean equipment promptly with paint thinner, mineral spirits, or turpentine.

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, , and ropes.

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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

* Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. 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. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made. *