



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON D C 20460

OFFICE OF PREVENTION PESTICIDES AND TOXIC SUBSTANCES

DEC 30 1996

Sangeeta Khattar
IBC Manufacturing Company
5966 Heisley Road
Mentor, OH 44061

Subject PQ-8 Liquid Antimicrobial Concentrate
EPA Reg Number 1022-476
Your submission dated September 27, 1996

Dear Ms Khattar

The amended labeling referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable provided that you make the following changes

1 Change the IF IN EYES portion of the STATEMENT OF PRACTICAL TREATMENT to the following language

IF IN EYES Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes Get medical attention

2 Change the IF ON SKIN portion of the STATEMENT OF PRACTICAL TREATMENT to the following language

IF ON SKIN Wash with plenty of soap and water Get medical attention

3 Change the IF SWALLOWED portion of the STATEMENT OF PRACTICAL TREATMENT to the following language

IF SWALLOWED Call a doctor or get medical attention Do not induce vomiting Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water Avoid alcohol

4 Replace the precautionary statements with the following

Corrosive Causes irreversible eye damage Harmful if swallowed Do not get in eyes on skin, or on clothing Wear protective clothing, goggles, and rubber gloves when handling Wash thoroughly with soap and water after

2/5

handling. Do not breathe spray mist. Remove contaminated clothing and wash before reuse.

On December 18, in your discussion with Tobi Colvin-Snyder of my staff, you stated that the pH of this product is between 2.2 and 3.0. However, according to the CSF for the alternate formulation dated March 7, 1994, the pH of this product is approximately 1. You also said that you intend to file a notification with the Agency correcting this error on the CSF. If the pH of approximately 1 stated on the CSF is incorrect, the notification revising the pH must be submitted to the Agency no later than January 30, 1996. If the pH of this product is less than 2, the following additional changes must be made in order for this label to be acceptable:

5. Place the word "POISON" and the skull & crossbones symbol on the label. According to 40 CFR 158.340, the acute dermal toxicity of this product is category I if the pH of the product is less than 2. The word "POISON" and the skull and crossbones symbol are required whenever a product is classified as toxicity category I due to the results of the acute dermal toxicity study [40 CFR 156.10(h)(1)(i)].

The word "POISON" and the skull and crossbones symbol must appear in immediate proximity to the signal word which must be "DANGER". "POISON" must appear in red on a contrasting background.

6. Replace the precautionary statements with the following language instead of the language provided in #4. above:

Fatal if absorbed through skin. Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear protective clothing, goggles, and rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Do not breathe spray mist. Remove contaminated clothing and wash before reuse.

If you have any questions about this letter, please contact Tobi Colvin-Snyder at 703-305-7801.

Sincerely,



for Philip Errico
Acting Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

3/5

Net Contents:

PQ-8[®]

Liquid Antimicrobial Concentrate
For Control of Sapstain and Mold in Freshly Cut Lumber and Timber

FOR INDUSTRIAL USE ONLY

Ingredient Statement

Active Ingredient:	
Copper 8-Quinolinolate:	5.4%
Inert Ingredients:	94.6%
Total:	100.0%

Covered under by IBC Manufacturing Company
U.S. Patents Nos. 4,766,113 and No. 4,602,011

EPA Reg. No. 1022-476

EPA Est. No. 1022-TN-1

96 SEP 30 P12:29

RECD EPA/OPP/DPD1

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Immediately flush with plenty large quantity of water for at least 15 minutes, and Get get medical attention.

IF ON SKIN: Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Flush with water. Remove and wash contaminated clothing before reuse.

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

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 30 1996

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

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

1022-476

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage and skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles and rubber gloves when handling. Wash thoroughly with soap and water after handling. Do not breathe spray mist. Harmful if swallowed.

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 sewage treatment plant authority. For guidance, contact your State Water board or Regional Office of the Environmental Protection Agency. ~~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.

DIRECTIONS FOR USE

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

PQ-8® fungicide is a non-alkaline water-soluble formulation of copper 8-quinolinolate which mixes readily with water. PQ-8 is supplied as a concentrate for automatic dilution with the correct amount of water, using either the Sure-Mix or Dispenser system or simple hand mixing and may then be applied to wood products by dip, spray or flowcoat.

Freshly cut wood should be treated as soon as possible, but not more than 24 hours after cutting, within 24 hours. Otherwise fungal attack may extend below the surface of the wood, beyond the reach of a surface fungicide treatment. Remove sawdust and other debris from application apparatus daily to maintain solution effectiveness. Freshly treated lumber should be protected from rain.

BASE STRENGTH: For lumber 2 inches or less in thickness, one gallon of PQ-8 is combined with 250 gallons of water. Under average conditions, a Base Strength solution provides fungus control when applied to rough cut wood, provided drying, storage, and shipment are carried out in accordance with optimum industry standards. In higher hazard conditions (elevated temperature, humidity, etc.) more concentrated solutions may be used. See below.

STRONGER THAN BASE STRENGTH: Stronger solutions are needed for thicker than 2 inch lumber, for tightly bundled lumber, surfaced wood and for prolonged exposure to wet conditions. These higher-than-Base Strength solutions usually are in the range of one gallon of PQ-8 diluted with 50 to 100 gallons of water.

Smooth surfaced lumber normally retains only one-half as much fungicide solution as a rough cut wood and hence needs a concentration of double the Base Strength to deposit the necessary amount of fungicide on the wood.

Wood products for use in the particle board production process may be protected from sapstain and mold by the same treating processes recommended for freshly cut lumber and timber.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL: Pesticide wastes are ~~toxic, 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.

CONTAINER DISPOSAL: DO NOT reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate in accordance with Federal, State, or local authorities, ~~incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.~~

BULK CONTAINERS (TOTE TANKS): Triple rinse (or equivalent). Return empty container to point of purchase for refill.

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

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such 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 EXCEPT IN WRITING WITH A SPECIFIC REFERENCE TO THIS WARRANTY.** In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

PQ-8 is a registered trademark of IBC Manufacturing Company.

File: IBC/ISK Product Labels/IBC Labels/Copper-8-Quin/PQ-8
Latest EPA Stamped Approved Label: November 9, 1995
Final Printed Label Submitted to EPA: February 14, 1996
Circulated for Internal Review on August 6, 1996 - revisions under the Directions for Use Section (additional language) and Storage & Disposal (addition of bulk containers).
Label Amendment - Revisions under the Directions For Use Section and Storage and Disposal Section. Submitted to EPA for Review on September 27, 1996