

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 18 2001

Ms. Gail Early
Registration Representative
IBC MANUFACTURING COMPANY
416 East Brooks Road
Memphis, TN 38109

Dear Ms. Early:

Subject: Revised Label
PQ-56
EPA Registration Number 1022-489
Your Amended Application Dated April 19, 2001

The amendment 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:

1. Submit and/or cite all data or material required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA sec. 4 when the Agency requires all registrants of similar products to submit such data.
2. Since you are adding new label claims, you must complete and return the enclosed Certification with Respect to Citation of Data (Offer-To-Pay Statement), EPA Form 8570-34 (Rev. 9-97).
3. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a). Revise the First Aid statement to read as follows:

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 SWALLOWED	<ul style="list-style-type: none"> •Call 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 to do so by the poison control center or doctor.
HOT LINE NUMBER	
<p>"In case of emergency call toll free at (Registrant fill in)." The product container or label with you when calling a poison control center or doctor or going for treatment."</p>	

NOTE TO PHYSICIAN

CONCURRENCES

SYMBOL	"Probable mucosal contact indicate the use of gastric lavage."					
SURNAME	<i>J. R. [Signature]</i>					
DATE	<i>7/17/01</i>					

The following statements are suggested types of information that may be included in the first aid statement.

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

b. Add the following: Personal Protective Equipment (PPE) statement to the label.

Personal Protective Equipment (PPE)

Handlers must wear:

Coveralls over long-sleeved shirt and long pants

Socks and chemical resistant shoes

Goggles or face shield and Chemical-resistant gloves (such as or made out of any water proof material)

A respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH) approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P, or HE prefilter..

c. Add the following User Safety to the label:

“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.”

“Users should remove PPE immediately after handling this product.”

“Wash outside of gloves before removing. As soon as possible, wash thoroughly.”

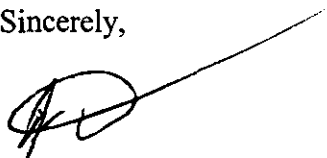
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Submit three (3) copies of your final printed labeling before you release the product for shipment.

A stamped copy is enclosed for your records.

If you have any questions regarding this letter, please contact LaVerne Dobbins at (703) 308-6378.

Sincerely,



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

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PQ-56
ANTIMICROBIAL-PRESERVATIVE

PQ-56
ANTIMICROBIAL - PRESERVATIVE

CONTROLS DECAY, STAIN
MOLD, ROT, MILDEW AND TERMITES

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JUL 18 2001
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 1022-489

Active Ingredient:	
Copper 8-quinolinolate.....	10.00%
Inert Ingredients:	90.00%
Total:	100.00%

EPA Reg. No. 1022-489

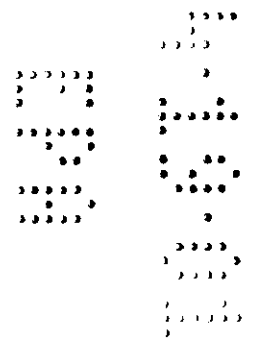
EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

DANGER

See Precautionary Statements.

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



PQ-56
ANTIMICROBIAL-PRESERVATIVE

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes or on clothing. Wear goggles and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

Statement of Practical Treatment

IF IN EYES: Flush with plenty of water. Get medical attention.

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

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of wastes.

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.

DIRECTIONS FOR USE

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

~~PQ-56 is a concentrate to be diluted with water for use. Apply by brush, spray or dip. Suitable use dilutions in water range from 1:3 (1 gallon PQ-56 to 3 gallons water) to 1:40 depending upon end use and degree of protection needed as described below.~~

PQ-56 is a non-alkaline water-soluble formulation of copper-8-quinolinolate which mixes readily with water. PQ-56 is supplied as a concentrate for 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. Suitable dilutions range from 1:3 (1 gallon PQ-56 to 3 gallons water) to 1:400 depending upon end use and degree of protection needed as described below.

WOOD

For general wood preservation and wood in contact with fruit, vegetables, and other foodstuffs: includes boxes and bins, mushroom trays, pallets, nursery trays, flats, stakes, fences, shingles, siding, millwork, timber, lumber and furniture. Reinspect annually for evidence of termite attack and retreat as necessary. Paintable after 48 hours drying.

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PQ-56
ANTIMICROBIAL-PRESERVATIVE

ABOVE GROUND SERVICE

For mild conditions apply liberally by brush or spray at 1:40 use dilution in water. For severe conditions dilute 1:20 in water and dip for a minimum of three minutes.

GROUND CONTACT SERVICE

Durability is directly related to the amount and uniformity of distribution in the wood. Dilute 1:10 with water and apply liberally by brush or dip. For maximum durability dip for 24-48 hours to obtain a minimum absorption of 6 pounds of preservative solution per cubic foot of wood. Where dip treatment is not feasible, apply a liberal brush application of a 1:3 dilution.

GENERAL PRESERVATION

Suitable for canvas and other textiles, rope and nets, and paper products. Apply by brush, spray or short dip at 1:50 to 1:25 depending upon the severity of service.

ENVIRONMENTAL SURFACES

For control of mold and mildew on paint, varnish, concrete, brick, glass, tile, metals, plastic, wood, paper, leather, textiles and asphalt shingles. Reinspect annually and retreat as necessary. Clean surface by washing or, at a minimum, brushing off dirt. Apply by brush or spray to point of runoff.

For mild service, dilute 1:400 in water. For moderate service, dilute 1:200. For severe service, 1:100.

POTATO RING ROT

PQ-56 is an effective disinfectant against the ring rot organism, *Corynebacterium sepedonicum*. PQ-56 is a useful aid in the effort to control potato ring rot contamination from planters, seed handling equipment, seed cutters, storages, trucks, railcars, etc. PQ-56 should be applied prior to and during potato seed cutting and planting.

Dilute PQ-56 1:200 in water with careful agitation. Adding PQ-56 to water will lessen the foaming associated with mixing. Spray all surfaces with a non-mist nozzle at about 20 psi. The treatment will be most effective if all surfaces have been washed free of dirt and debris and allowed to dry prior to application. A combination of steam cleaning followed by treatment with PQ-56 will be more effective than treatment with PQ-56 alone, especially for porous surfaces that are hard to clean. Although PQ-56 is not phytotoxic to cut seed potatoes, do not treat the potato seed surfaces. The additional moisture applied in rewetting of the potato surface can cause storage problems due to secondary attack from soft rot organisms.

SAPSTAIN CONTROL IN FRESHLY CUT LUMBER AND TIMBER

PQ-56 is an excellent protective fungicide against a broad spectrum of fungi, including those which cause defacement of freshly-cut lumber. When applied to freshly sawn lumber, PQ-56 is effective as a protective fungicide against molds, and staining/fungal organisms.

Freshly cut wood should be treated as soon as possible. Effective control requires complete coverage of the wood surface by the fungicide as a preventative application prior to development of fungal organisms. Wood which has been colonized by mold or sapstain fungi prior to treatment will not be protected.

Freshly treated lumber should be protected from rain which will reduce the effectiveness of the treatment.

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This product may be used as a supplemental surface fungicide on dry or partially seasoned wood to prevent stain and mold during storage, transport, or holding in concentration yards.

Extremely hot and humid conditions favor the development of molds and sapstain fungi. Under these conditions, use the higher recommended rate of 1/2 gallon to 1.0 gallon per 100 gallons of solution. A minimum retention of 10 ug/cm² of copper-8-quinolinolate is recommended.

Wood products for use in making particle board may be protected from molds and sapstain by the same treating process used for freshly cut lumber and timbers.

Add the required amount of PQ-56 slowly to the mixing tank while filling. Continuously agitate the mixture during treatment.

BULK DIP VATS: For bundles of lumber which are to be treated in a dip tank or vat, add at a rate of 1/4 to 1 gallon of PQ-56 to 100 gallons of water. The lumber should remain in solution for at least one minute and all lumber surfaces should be exposed to the treating solution. Agitation of the dip vat solution is required to maintain a uniform suspension of the treatment materials in the tank if borax is added to the dip solution. During dipping, the cut boards should be loosely bundled to allow maximum penetration of the treatment material into the bundle.

NON-BULK VATS: For individual boards which are treated in across-the-chain vats (non-bulk vats), add at a rate of 1/4 to 1 gallon of PQ-56 to 100 gallons of vat water.

LOW VOLUME SPRAY MACHINES: For individual boards which are treated in low volume spray machines, add 1/4 to 1/2 gallon of PQ-56 to 20 gallons of water. Smooth surfaced lumber normally retains only about one-half as much fungicide solution as rough cut wood and, therefore, needs the higher rate to deposit the necessary amount of fungicide on the wood. Some agitation is required in nurse tank to maintain a uniform suspension if borax is in the spray mixture.

Note: For best results, the use of a buffering agent, such as borax or Adjust-O-Bor™, is recommend. Use 10 – 12 pounds 10-mol Borax or one gallon of Adjust-O-Bor for each gallon of PQ-56, to maintain the pH around 8.0. These levels of borax will reduce corrosion and enhance fungicidal activity.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: 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.

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.

Adjust-O-Bor is a trademark of ISK Americas Incorporated.

PQ-56
ANTIMICROBIAL-PRESERVATIVE

WARRANTY STATEMENT AND DISCLAIMER

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.

