

PM 32

1022-507

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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 Naphthenate 1%
EPA Registration Number 1022-507
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. Change "General Directions" to read "Directions for Use".

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.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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 1%
Wood Preservative**

Ready-to-Use

FOR EXTERIOR USE ONLY

Ingredient Statement

Active Ingredient:

Copper naphthenate.....7.5%*

Inert Ingredients:.....92.5%

Total:100.0%

*Equivalent to 1% metallic copper

**MEETS REQUIREMENTS OF FEDERAL SPECIFICATION TT-W-572B,
COMPOSITION B.**

EPA Reg. No. 1022-507

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, this pesticide
registered under EPA Reg No

1022-507

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

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COPPER NAPHTHENATE 1%

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Do not breathe fumes. Use outdoors or with adequate ventilation.

Do not get in eyes. In case of skin contact wash with soap & water. Prolonged contact with skin may cause irritation. Remove contaminated clothing and wash skin with soap and water. Protective gloves normally not needed. Use chemical resistant gloves to avoid skin contact, if necessary. Eye protection normally not required.

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 reuse.

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

ENVIRONMENTAL HAZARDS

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

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store 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.

Product 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 repackager(s) or formulator(s) telephone number.

GENERAL DIRECTIONS

Copper Naphthenate 1% requires no dilution before use. Use as received, following label directions. It is intended for wood products that usually require painting or stenciling such as millwork and the like or in special situations to treat lumber for long storage in the open by simple non-pressure method.

FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 liberal coats by brush, roller, or spray applications should be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to painting.

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

RECOMMENDED FOR

Windows, window frames, doors, stairs, porches, shingles, steps, interior trim, wall paneling, furniture, fence pickets, fence rails, furring strips, flooring and beverage cases. Powder post beetles which invade furniture, flooring and structural lumber are killed by application of this preservative. These insects will not attack the treated wood.

In addition to preventing decay, blue stain, and insect attack on wood this preservative controls warping, swelling, shrinking, and end checking caused by changes in moisture content of lumber and plywood products.

Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with Copper Naphthenate 1% Wood Preservative.

Wood treated with Copper Naphthenate 1% 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. Open dumping is prohibited.

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 approved State and local procedures.

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 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 the 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 1022-507

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.