



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**September 22, 2003**

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

Subject: **Copper Naphthenate 1%**  
EPA Registration No. 1022-507  
Application Dated July 1, 2003

Dear Gail Early:

This following labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comments.

**Proposed Amendment**

- Update First Aid Statement per PR Notice 2001-1

**Label Comment**

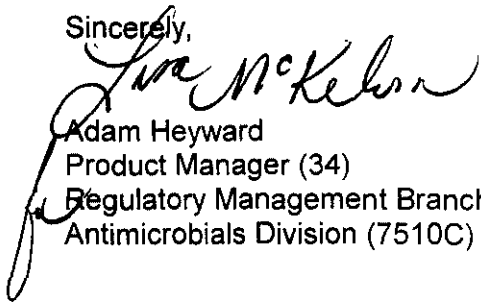
1. The net contents must be added to the final label or on the container.
2. On page 3, under the subheading "Recommended For", change the statement "Wood treated with Copper Naphthenate 1% should not be used....." to "Wood treated with Copper Naphthenate 1% **must** not be used....."
3. The precautionary statement heading should all be in the same large bold print.

**General Comment**

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

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,

A handwritten signature in black ink that reads "Lisa McKelvin". The signature is written in a cursive style with a large, looping initial "L".

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

Enclosure

3 7 6

COPPER NAPHTHENATE 1%

**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**

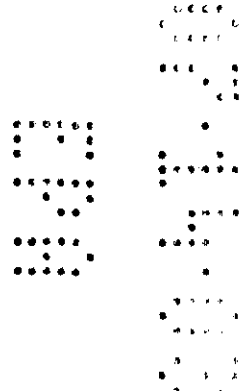
**WARNING**

See Precautionary Statements.

**ACCEPTED  
with COMMENTS  
EPA Letter Dated:**

SEP 22 2003

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



Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1022-507

4 8 6

**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.

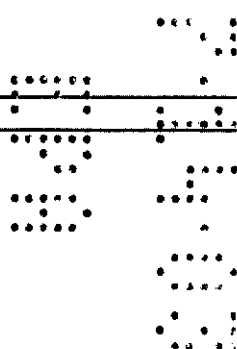
<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>▪ Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>▪ Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>▪ Take off contaminated clothing.</li> <li>▪ Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>▪ Call a Poison Control Center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>▪ Call a poison control center or doctor immediately for treatment advice.</li> <li>▪ Have person sip a glass of water if able to swallow.</li> <li>▪ Do not induce vomiting unless told by a Poison Control Center or doctor.</li> <li>▪ Do not give anything by mouth to an unconscious person.</li> </ul>
<b>HOT LINE NUMBER</b>	
<p style="text-align: center;"><b>In case of emergency, call Chemtrec toll free at 800-424-9300.</b>  <b>Have the product container or label with you when calling a poison control center or doctor or going for treatment.</b></p>	

**ENVIRONMENTAL HAZARDS**

This product 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 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.

**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 "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.

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 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, fence pickets, fence rails and beverage cases. Powder post beetles which invade 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.

6 8 6

**COPPER NAPHTHENATE 1%**

**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.

