IBC MANUFACTURING COMPANY

April 21, 1994

(via DHL)

Ms. Cynthia Giles-Parker (PM-22) Registration Division (H7505C) Office of Pesticide Programs U.S. Environmental Protection Agency Document Processing Desk Room 266A, Crystal Mall 2 1921 Jefferson Davis Highway Arlington, VA 22202

Dear Ms. Giles-Parker:

SUBJECT: NOTIFICATION - Update Environmental Hazard Statement in

Accordance to PR-Notice 93-3

1022-491

Product Labels: PO-15 RTU

WOODGUARD 1022-514 CUNAPSOL-1 1022-518 CUNAPSOL-5 1022-522 WEED FREE G 1022-271

Enclosed, please find a copy of the subject product labels for which IBC Manufacturing Co. has updated the Environmental Hazard Statement as per PR-Notice 93-3.

We have incorporated the exact wording as recommend in the PR-Notice, therefore, the submission is being submitted as a NOTIFICATION.

The distributors have been notified by IBC Manufacuturing Co. to change the Environmental Hazard Statement on their label accordingly.

Thank you for your attention to this matter.

Sincerely,

IBC MANUFACTURING COMPANY

Sangeeta V. Khattar

Registrations Representative

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svk/199 Enclosures

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Memphis TN 38109

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WOODGUARD

Oil-Based Wood Preservative

The Superior One-Coat, Penetrating Treatment

IDEALLY SUITED FOR LOG HOMES, SIDING, FENCES, AND ROOFS

CLEAR--right from the can--highlights wood's natural beauty STAIN--by adding pigment--color without hiding wood grain Allows wood to develop its natural weathered beauty

TEST BEFORE USING ON SMOOTH DENSE WOOD.

DO NOT USE ON PAINTED SURFACES.

WOODGUARD MUST PENETRATE TO BE EFFECTIVE.

Ingredient Statement

Active Ingredient: Copper 8-quinolinolate	
Total:	
This product contains Petroleum Distillates.	
EPA Reg. No. 1022-514	EPA Est. No. 1022-TN-1

This product exceeds NWWDA and Fed. Spec. TT-W-572 Water Repellency requirements.

KEEP OUT OF REACH OF CHILDREN CAUTION

See Precautionary Statements

IBC MANUFACTURING COMPANY 416 East Brooks Road - P.O. Box 9158 Memphis, TN 38109

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Avoid contact with skin, eyes or clothing. Harmful if swallowed. Avoid breathing spray mist.

FIRST AID

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 DOCTOR.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. For terrestrial uses, 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 when disposing of equipment washwater.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

RECOMMENDED USES

WOODGUARD * is an oil based transparent preservative designed for log homes, siding, fences, and wood shingle roofs. WOODGUARD's oil formula provides long-term protection by penetrating deeply into the wood. It achieves maximum performance on rough sawn lumber, old weathered wood and new porous wood where maximum penetration results in **exceptional water repellency** on sloping roofs and vertical surfaces; horizontal surfaces are normally subjected to more severe weathering and will usually require earlier retreatment. In harsh exposures involving standing water, retreatment may be required annually to maintain water repellency.

Do not use on film formed (painted) surfaces.

Surfaces previously treated with a semi-transparent stain (non-film forming) may be satisfactorily recoated with WOODGUARD when a superior, water repellent wood preservative is desired. If WOODGUARD is applied to non-porous surfaces which prevent or significantly retard penetration, reduced performance or even complete failure can result. Test first if in doubt.

WOODGUARD combines mold and decay control with unique and EXCEPTIONAL WATER REPELLENCY THAT WITHSTANDS OUTDOOR VERTICAL WEATHERING, ESPECIALLY ON OLD, CRACKED WEATHERED WOOD. WOODGUARD IS TOXIC TO TERMITES AND POWDERPOST BEETLES. WOODGUARD cannot chip, crack or peel. When applied as directed, it leaves a uniform, streak-free appearance.

WOODGUARD protects and extends service life by inhibiting mold and decay, as well as cupping and warping. A single coat application is recommended every 2 to 4 years on vertical surfaces

WOODGUARD

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Double coat applications are not needed or recommended. WOODGUARD cleans up with water and detergent at time of application - provided it has not soaked into the surface. Cured WOODGUARD will clean up with paint thinner or mineral spirits.

WOODGUARD (clear) temporarily darkens wood color which later greys after weathering. Use pigmented WOODGUARD to help hide this greyed effect.

DIRECTIONS FOR USE

It is a violation of Federal law to use WOODGUARD in a manner inconsistent with its labeling.

Apply liberally to log buildings, wood siding, fencing or roof by simply wetting down the surface as follows:

- Spray Standard spray equipment is suitable. Set nozzle to deliver a low pressure, coarse spray and back brush as necessary.
- Brush A regular paint brush is fine for most surfaces. For uneven shingle or rough surfaces, use a stiff bristle brush. Apply evenly, brushing out sags, etc. as necessary.
- Roller Use a long nap for rough surfaces.

ONE COAT IS SUFFICIENT. Surface must be clean and free of all loose debris. Apply to dry wood for maximum penetration and fastest drying. WOODGUARD may be applied to damp wood; however, performance will be reduced.

Avoid contact with grass, shrubs and trees.

NOTE:

- 1. Stir or shake well before use.
- 2. WOODGUARD must soak into the wood. **Do not** apply to painted or otherwise sealed surfaces. If in doubt, apply to a small test area if it soaks in, WOODGUARD is suitable.
- Cure time is normally within 2 weeks, depending on temperature and wood porosity.
- Coverage: 150 to 300 sq. ft. per gallon, depending on surface condition and wood porosity.
- 5. Application temperature: apply above 50°F; the hotter the weather, the faster the drying. Below 65°F, WOODGUARD may become too viscous to spray.
- 6. WOODGUARD softens asphalt avoid contact.
- Do not apply if rain is expected within 36 hours.
- WOODGUARD provides an immediate water repellent barrier; however, its ability to bead water develops as it cures. Re-treat when the surface exhibits signs of losing capability to inhibit water penetration.
- 9. Avoid open flame during application and until WOODGUARD HAS soaked in completely.
- Subsequent painting WOODGUARD provides such strong properties of water repellency that subsequent applications of paint will not adhere as long as the WOODGUARD barrier remains intact. If in doubt, test first.

WOODGUARD

- WOCDGUARD protection will not withstand repeated contact with chlorine or chlorinated water. Avoid using on wood in contact with this chemical, or retreat as necessary.
- 12. Until WOODGUARD has thoroughly cured, treated surface may be slippery. WOODGUARD in its clear, untinted form is effective on many wood products greenhouse items, fruit and vegetable boxes, and other farm uses, especially wood surfaces in close proximity with animals, feedstuffs and the like.

TINTING INSTRUCTIONS

WOODGUARD is compatible with and may be colored by the addition of small quantities of the Universal Machine Colorants employed to color oil or water based paints. It is important to note that different colorants weather differently, and that color development varies with wood species, wood grain and wood undertone.

Consult your dealer for assistance in tinting WOODGUARD. WOODGUARD is a transparent preservative oil finish that **can be** tinted to a **light stain**; **do not** attempt to obtain a heavy or solid color stain by overloading with pigment. Approved formulas and sample chips are available from your dealer on request. The responsibility for the tint is that of the dealer and/or applicator.

Stir tinted WOODGUARD frequently when applying to keep pigments evenly dispersed and uniform. Coat surfaces evenly. If excess material results in laps, sags, or runs, this condition must be corrected promptly by back brushing or back rolling in order to achieve a uniform appearance.

WOODGUARD is **not** recommended for furniture or other contact surfaces because of slow drying characteristics. Consult your dealer for assistance.

STORAGE AND DISPOSAL

Do not reuse empty container. Rinse thoroughly before discarding in trash. Wrap container and put it in trash collection.

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. Manufacturer will only replace defective product. Under no circumstances will manufacturer be responsible for the cost of application, labor, or the cost of surface being re-finished. 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.