



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 9, 2005

Gail Early
Registrations Representative
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Subject: Woodguard-Oil Based Wood Preservative
EPA Registration Number 1022-514
Application Date: July 11, 2005
EPA Received Date: August 12, 2005

Dear Ms. Early:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Revised labeling

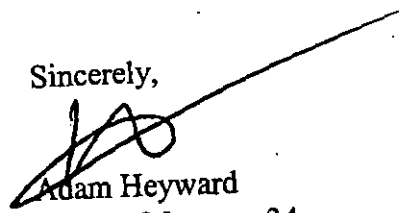
General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

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

Sincerely,


Adam Heyward
Product Manager 34

CONCURRENCES

Regulatory Management Branch H
Antimicrobials Division (7510 C)

IBOL	7510C						
NAME	Early						
TE	9-9-05						

289



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-514	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Woodguard	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 East Brooks Road Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor label changes (addition of decks).
This notification is consistent with the provisions of PR Notice 95-2 and the requirements of EPA's regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S. C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and the requirements of 40 CFR 152.46, this product may be in violation of FIFRA, and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Gail Early	Title Registrations Representative	Telephone No. (Include Area Code)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Gail Early</i>	3. Title Registrations Representative	
4. Typed Name Gail Early	5. Date July 11, 2005	

IBC MANUFACTURING COMPANY

3 8 9

July 11, 2005

Mr. Adam Heyward, Team Leader (34)
Regulatory Management Branch II
Antimicrobials Division (7510W)
U.S. Environmental Protection Agency
Crystal Mall #2
1801 South Bell Street
Arlington, VA 22202

Re: Woodguard (EPA Reg. No. 1022-514)
Notification of Minor Label Changes

Dear Mr. Heyward:

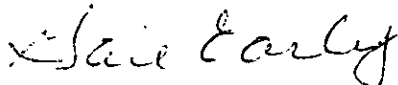
The purpose of this submission is to notify the agency of some minor changes to the above label as follows:

- Added "decks" as a use site in four places.
- Changed the wording on cure time from "is normally within 2 weeks" to "will range from 3 days to 2 weeks".
- Added a note regarding subsequent painting that a high or semi-gloss is available from their dealer.
- Deleted the paragraph just above the warranty reading, "Pigmented Woodguard is not recommended for decks dealer for assistance".

We are hopeful that this notification is acceptable. Enclosed is one copy of the label with these changes clearly indicated for your files.

If you have questions or need additional information, I can be reached at 901-344-5316 or earlyg@ibio.com.

Sincerely,



Gail Early
Registrations Representative

Enclosures

WOODGUARD

OIL BASED WOOD PRESERVATIVE

LOG HOMES . SHINGLES AND SHAKES . SIDING . FENCES . DECKS *

EXCEPTIONAL WATER REPELLENCY

THE SUPERIOR DEEP PENETRATING TREATMENT

IDEALLY SUITED FOR LOG HOMES, ROOFS, SIDING, FENCES AND DECKS *
ESPECIALLY ROUGH SAWN LUMBER
OLD WEATHERED WOOD
NEW POROUS WOODS

Test before using on smooth dense wood.
Do not use on painted surfaces.
Woodguard must penetrate to be effective
Wood must be dry before application (less than 18% moisture)

This product exceeds NWWDA and Fed. Spec. TT-W-572 Water Repellency requirements by 400%.

INGREDIENTS:

Active Ingredient

Copper 8-quinolinolate	0.675%
Inert Ingredients	99.325%
TOTAL	100.000%

This product contains Petroleum Distillates

EPA Reg. No. 1022-514

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautionary statements

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:	<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. ▪ Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> ▪ Call a 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 by a Poison Control Center or doctor. ▪ Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> ▪ Take off contaminated clothing. ▪ Rinse skin immediately with plenty of water for 15 – 20 minutes. ▪ Call a Poison Control Center or doctor for further treatment advice.

In case of emergency, call Chemtrec toll free at 800-424-9300.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

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.

PHYSICAL OR CHEMICAL HAZARDS

Do not store or use near heat or open flame.

STORAGE AND DISPOSAL

STORAGE:

Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

DISPOSAL:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Manufactured for:

ISK Biocides, Inc.
416 East Brooks Road
P. O. Box 9158
Memphis, TN 38109

Woodguard is an oil based transparent preservative designed for log homes, wood shingle roofs, siding, fences and decks. 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 sever weathering and will usually require earlier retreatment. In harsh exposures involving standing water, retreatment may be required annually to maintain water repellency.

*

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 or film-covered 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 ANOBIID 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. Always apply to the point of refusal. 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, roof, wood siding, fence or deck by simply wetting down the surface as follows:



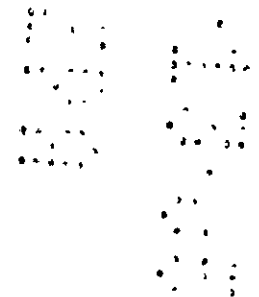
Spray –Do not use airless spray equipment. Use a garden-type, pump-up sprayer with adjustable nozzle. Set nozzle to deliver a low pressure, coarse spray and backbrush as necessary.

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. Wood must be dry before application (less than 18% moisture).

Avoid contact with grass, shrubs and trees.



NOTE:

1. Stir or shake well before use.
2. WOODGUARD goes on "dark" but lightens considerably during the curing period.
3. Cure time will range from 3 days to 2 weeks, depending on temperature and wood porosity. *
4. Coverage: 150 to 300 sq. ft. per gallon, depending on surface condition and wood porosity. Always apply to the point of refusal.
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, but easily spreads by brush down to 50°F.
6. WOODGUARD softens asphalt (including asphalt shingles) – avoid contact.
7. Do not apply if rain is expected within 36 hours.
8. 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.
10. 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. If a gloss or semi-gloss finish is desired, contact your Woodguard dealer. *
11. WOODGUARD 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 are available from your dealer or at www.woodguard.com.

Stir tinted WOODGUARD frequently when applying to keep pigments evenly dispersed and uniform. Coat surfaces evenly. Smooth sags or runs by feathering with a brush or cloth in order to achieve a uniform appearance.

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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.