

1022-514

09/26/2011

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

SEP 26 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Gail Watson
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Subject: **Woodguard**
EPA Registration Number: 1022-514
Application Date: July 25, 2011
Receipt Date: July 25, 2011

Dear Ms. Watson:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, and PR Notice 2007-4 is acceptable.

Proposed Amendments

Registrant is adding metallic copper equivalents and adding additional language to label.

General Comment:

A stamped label is enclosed. Submit a final printed label before distributing or selling the product bearing the revised labeling.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Glen McLeod by telephone at (703) 347-0181 or by email at mcleod.glen@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Jacqueline Campbell-McFarlane
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

WOODGUARD

EXTERIOR WOOD PRESERVATIVE AND FINISH

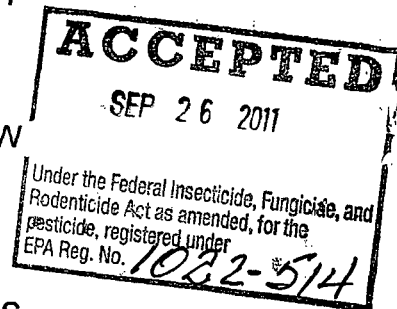
OIL BASED WOOD PRESERVATIVE

CONTROLS SURFACE MOLD, DECAY & MILDEW

EXCEPTIONAL WATER REPELLENCY

TOXIC TO TERMITES

MEETS VOC STANDARDS



LOG HOMES . SHINGLES AND SHAKES . SIDING . FENCES .

THE SUPERIOR DEEP PENETRATING TREATMENT

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

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 cleaned prior to Woodguard application (See Preparation and Maintenance Guide)

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%
Other Ingredients	99.325%
TOTAL	100.000%

*Metallic Copper Equivalent 0.12%

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.
<p>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.</p>	

ENVIRONMENTAL HAZARDS

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

[The following paragraph will appear only on 5-gallon containers – not applicable to 1-gallon containers]

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.

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PHYSICAL OR CHEMICAL HAZARDS

Do not store or use near heat or open flame.

STORAGE AND DISPOSAL

PESTICIDE STORAGE:

Protect pesticide containers from heat and cold. The storage area must be secured, dry, well lit, and well-ventilated. Keep pesticide storage areas clean. Clean up any spills promptly. Always store pesticide in the original container. If a leaky container must be contained within another, mark the outer container to identify the contents.

PESTICIDE DISPOSAL:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of capital 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:

Nonrefillable Container. Do not reuse or refill this container. Triple rinse as follows: Fill container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after flow begins to drip. Repeat procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Manufactured by:

IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Woodguard is an oil-based transparent preservative designed for log homes, wood shingle roofs, siding, and fences. 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.

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.

See the Woodguard Preparation and Application Guide for guidelines on preparation of the wood surface for Woodguard Application. 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 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.

New or weathered wood must be cleaned prior to your Woodguard application. See Preparation and Maintenance Guide for directions.

Apply liberally to log buildings, roof, wood siding, or fence 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 plants, 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: Do not apply if the overnight low temperature is below 50°F / 10°C or the daytime high temperature is above 95°F / 35°C. At 50 - 55°F, dilute with mineral spirits or turpentine – one pint to one gallon of WOODGUARD. 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, apply Woodguard TC®. Contact www.woodguard.com or your Woodguard dealer for details.

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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.

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.

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