

1022-514

4/11/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

APR 11 2014

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

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

**Subject:** Woodguard  
EPA Registration No.: 1022-514  
Application Date: March 12, 2014  
Receipt Date: March 14, 2014

Dear Ms. Watson:

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

**Proposed Notification:**

- Correction to the current label language listed in the Directions for Use section; "Preparation and Application Guide".

**General Comment:**

Based on a review of the material submitted your notification to correct the label language to "Preparation and Maintenance Guide" is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell.jacqueline@epa.gov](mailto:campbell.jacqueline@epa.gov) or Terria Northern by telephone at (703) 347-0265 or by e-mail at [northern.terria@epa.gov](mailto:northern.terria@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink that reads "Jacqueline Hardy".

Jacqueline Hardy  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)



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 Campbell	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 checked="" 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 to correct typographical error in Directions for Use.  
 This notification is consistent with the provisions of PR Notice 98-10 and EPA 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 statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 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 checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon & 5 gallon		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product litho and print				<input type="checkbox"/> Lithograph <input checked="" 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 Watson	Title Registrations Representative	Telephone No. (Include Area Code) 901-544-5316
<b>Certification</b> 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 both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Gail Watson</i>	3. Title Registrations Representative	
4. Typed Name Gail Watson	5. Date March 12, 2014	

**IBC MANUFACTURING COMPANY**

3/10

March 12, 2014

Ms. Jacquelyn Campbell (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Re: Notification of Minor Label Amendment (Correct Typo)  
Woodguard (EPA Reg. 1022-514)

Dear Jacquie:

The purpose of this submission is to notify the Agency of a minor label change to the above product's label.

When we last amended this label, we failed to change one word in the Directions for Use on page 4. The "Preparation and Maintenance Guide" was incorrectly called "Preparation and Application Guide". This notification makes the change from "Application" to "Maintenance".

The correction on page 4 has been highlighted for ease of review.

Please make this revised label a part of the file for this product. If you have questions or need additional information, I can be reached at 901-344-5316 or [watson@ibio.com](mailto:watson@ibio.com).

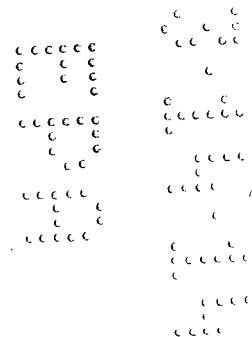
Sincerely,



Gail Watson  
Registrations Representative

gw

Enclosures



4/10

NOTIFICATION  
Date Reviewed: \_\_\_\_\_  
Reviewed By: \_\_\_\_\_

# 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 . DECKS

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 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

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**

<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 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>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>
<p><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. 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.

**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:**

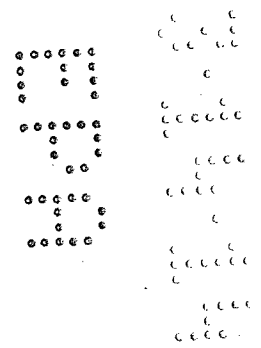
Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of capital Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste 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 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, 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 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 on a small area if in doubt.

See the Woodguard Preparation and Maintenance 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, 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.

**SPECIAL INSTRUCTIONS FOR DECKS:** Add one quart of turpentine to each 5 gallon pail of Woodguard to be used and mix well prior to application on decks to improve penetration and curing.

**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. If unsure of temperatures on cool days, add one quart of turpentine to each 5 gallons of Woodguard used and mix well to improve penetration into the wood and aid in cure times. This will also assist in spraying at cooler temperatures. DO NOT OVER DILUTE or performance will be reduced.
6. WOODGUARD softens asphalt (including asphalt shingles) – avoid contact.
7. Do not apply if rain is expected within 36 hours.



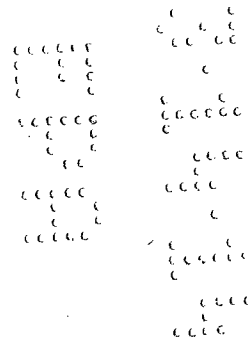
- 8. WOODGUARD provides an immediate water repellent barrier; however, its ability to bead water develops as it cures. Re-treat when the surface exhibits signs of losing capability to inhibit water penetration.
- 9. Avoid open flame during application and until WOODGUARD has soaked in completely.
- 10. 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.
- 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](http://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.

Woodguard<sup>®</sup> is a registered trademark of IBC Manufacturing Company.

