

1022-518

1025

**IBC MANUFACTURING COMPANY**

April 21, 1994

(via DHL)

Ms. Cynthia Giles-Parker (PM-22)  
Registration Division (H/505C)  
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

Product Labels:	PQ-15 RTU	1022-491
	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**

*S. Khattar*  
Sangeeta V. Khattar  
Registrations Representative

svk/199  
Enclosures

3070

**CUNAPSOL-1**  
**Wood Preservative**  
***Ready-to-Use***

**Ingredient Statement**

<b>Active Ingredient:</b>	
Copper Napthenate.....	9.08%
<b>Inert Ingredients:</b> .....	90.92%
<b>Total:</b> .....	100.00%

\* Equivalent to 1% metallic copper

Cunapsol-1 weighs approximately 8.5 lbs. per gallon

Volatile Organic Compounds <350 gm./liter

VOS (excluding water) < 0.35 kg./liter

EPA Reg. No. 1022-518

EPA Est. No. 1022-TN-1

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**STATEMENT OF PRACTICAL TREATMENT**

**IF IN EYES:** Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes.

**IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

**See Back Panel for Additional Precautionary Statements.**

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

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**PRECAUTIONARY STATEMENTS**

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**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER**

Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Wear goggles or face shield.

Harmful if inhaled. Avoid breathing spray mist.

Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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**ENVIRONMENTAL HAZARDS**

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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 by cleaning of equipment or by disposal of wastes.

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**PHYSICAL AND CHEMICAL HAZARDS**

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Do not use or store near heat or open flame.

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**RECOMMENDED USES**

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Windows, window frames, doors, stairs, porches, siding, shingles, trellises, steps, sub-flooring, interior trim, wall paneling, furniture, fence pickets, and rails, furring strips, arbors, flooring and beverage cases. Powder post beetles which invade furniture, flooring and structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood rot protection of interior use wood is only needed on wood which is subject to frequent or prolonged wetting (e.g. condensation, rain seepage).

Cunapsol-1 may also be used on fence posts, poles, foundation sills, decks, boats and all wood exposed to moisture or weather.

Due to its very low phytotoxicity, Cunapsol-1 can be used to treat wood for greenhouses, nursery flats, etc.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-1 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 Cunapsol-1 Wood Preservative.

Cunapsol-1 may be used where livestock and dairy animals may come in contact with the treated wood. Wood treated with Cunapsol-1 should not be used where it may come in contact with food, feed or potable water. See Technical Bulletins for additional uses.

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**DIRECTIONS FOR USE**

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

Cunapsol-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 or in ground contact by simple non pressure method.

The best results will be obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 liberal brush 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.

Ground contact: Seasoned or green wood may be treated. Make certain the wood is free of bark, then immerse in Cunapsol-1 for 12 to 48 hours or until the sapwood is completely penetrated.

Water repellents may be admixed with Cunapsol-1 to improve dimensional stability of the treated wood. Colorants may be admixed for aesthetics and additional u v protection. This product is compatible and may be colored by the universal machine colorants employed to color oil or water based paints. Note that colorants weather differently, and that color development varies with species, grain and wood undertone.

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### **STORAGE AND DISPOSAL**

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**PROHIBITIONS:** Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

**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.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of 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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

**GENERAL:** Consult Federal, State or local disposal authorities for approved alternative procedures.

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### **WARRANTY AND LIMITATION OF DAMAGES**

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Proper application is critical to the effectiveness of the product, however, when applied and used according to this label Cunapsol-1 is capable of protecting wood for uses described. The actual life of the treatment will be affected by the condition of the wood when treated, the species of wood, the type of exposure, and the previous and subsequent treatment.

**READ THE LABEL THOROUGHLY AND COMPLY WITH ALL DIRECTIONS AND WARNINGS GIVEN, AND USE COMMON SENSE IN HANDLING.**

IBC MAKES NO WARRANTIES, EITHER EXPRESS OR IMPLIED, OTHER THAN AS SET FORTH ON THIS LABEL, AND IBC DISCLAIMS ANY IMPLIED WARRANTY OR MERCHANTABILITY NOT SPECIFICALLY SET FORTH ON THIS LABEL. IBC SHALL NOT BE RESPONSIBLE FOR ANY PERSONAL INJURY OR PROPERTY DAMAGE OR OTHER TYPE OF LOSS RESULTING FROM FAILURE TO FOLLOW DIRECTIONS FOR USE. WARNINGS AND PRECAUTIONARY LANGUAGE GIVEN ON THIS LABEL. IBC SHALL NOT BE RESPONSIBLE FOR DAMAGE TO PROPERTY BEYOND THE PURCHASE PRICE OF THIS PRODUCT; HOWEVER, SOME

STATES DO NOT ALLOW THE INCLUSION OR LIMITATION OF INCIDENTAL OR CONSEQUENTIAL DAMAGES, SO THIS LIMITATION MAY NOT APPLY TO YOU.