

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 1997

IBC Manufacturing Company
5966 Heisley Road
Mentor, OH 44060

Attention: Sangeeta V. Khattar
Registrations Representative

Subject: Cunapsol-1
EPA Registration Number 1022-518
Your Submission Dated March 20, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

1. Revise the Environmental Hazards to read as follows:

"This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA".

2. Place the "Recommended Uses" under the "Directions for Use" Statement.

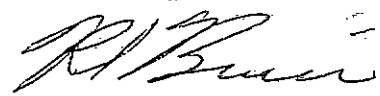
A stamped copy of your labeling is enclosed for your records. Submit one (1) copy of the final printed label prior to release of the product for shipment.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

If you have any questions concerning this letter, please contact Delores Williams at (703) 308-6372.

Sincerely,



Robert S. Brennis
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7504C)

CUNAPSOL-1

Wood Preservative

FOR EXTERIOR USE ONLY

Ready-to-Use

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 15 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.

Ingredient Statement

1022-518

Active Ingredient:

Copper Napthenate.....	9.08%*
Inert Ingredients:	90.92%

Total:	100.00%
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*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

PRECAUTIONARY STATEMENTS

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.

DO NOT breathe vapors or mist during brush, roll, spray, and dip applications. Wear a NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of the product.

In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300.

Application of this product may produce strong, lingering, unpleasant odor.

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 by cleaning of equipment or by disposal of wastes.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

RECOMMENDED USES

Windows, window frames, doors, stairs, porches, siding, shingles, steps, interior trim, wall paneling, furniture, fence pickets, and rails, furring strips, 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 exterior wood exposed to moisture or weather. Pretreatment only. Do Not apply at sites on or near water or wetlands.

Since Cunapsol-1 has very low phytotoxicity it 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.

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.

DIRECTIONS FOR USE

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

Use only the application method specified for a particular use.

Products formulated or repackaged from this product must be labeled for "Exterior Use Only," and must bear all the statements listed under the section entitled Precautionary Statements and the formulator(s) or repackager(s) telephone number.

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.

FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING

ABOVE GROUND CONTACT

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 coats, roller, 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.

COVERAGE: One gallon covers 100 - 300 sq. ft. depending upon the wood species, porosity of wood, and method of application.

Water repellents may be admixed with Cunapsol-1 to improve dimensional stability of the treated wood. Colorants may be admixed for aesthetics and additional uv 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.

STORAGE AND DISPOSAL

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.

WARRANTY AND LIMITATION OF DAMAGES

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.

File: Special Review - cu Nap Labels/Cunapsol I (1 LV) 1022-518

This label was revised in response to the review initiated by the Special Review Branch. The Naphthenate Salts Research Task Force decided not to pursue indoor uses for copper naphthenate. Sue Crescenzi hand delivered this revised label to Tom Moriarty of EPA on March 7, 1997.