

1022-518

6/8/2009

1 of 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

JUN - 8 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Subject: **Cunapsol -1**
EPA Registration Number: 1022-518
Application: March 13, 2009
Receipt Date: March 17, 2009

Dear Ms. Watson:

The following amendment, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions below.

Proposed Amendment

Alternate Confidential Statement of Formula (CSF) no. 4

The alternate CSF no. 4 dated 3/13/09 has been found acceptable and will be made part of the record for this file.

Revise the label as follows:

1. Revise Directions for Use as per PR Notice 2000-5 with regard to mandatory and advisory language as follows:
 - a. Delete "wood treated with this preservative should not be used where it may come in contact with food feed or potable water," and replace it with "Do not use wood treated with this preservative where it may come in contact with food, feed or potable water."
 - b. Revise "Recommended uses:" to read "Manufactured for use on:"
Delete the word "recommended" everywhere in the Directions for Use and replace it with "manufactured for."
 - c. At the top of page 3, revise "it can be used to treat," which is advisory to read "manufactured to treat," which is mandatory.
 - d. After Application Procedures, delete the phrase "For best results," and direct that the consumer application must be made by dip treatment, brush, roller or pump sprayer.

- e. Under Below Ground, Ground or Fresh Water Contact, replace "Seasoned (weathered) or green (new) wood may be treated " with "manufactured for the treatment of seasoned (weathered) or green (new) wood..."
- f. After the phrase, "If dipping is not possible," direct the consumer that 2 brush coats, roller or spray applications are the intended application methods by replacing "should be" with "are to be applied."
- g. Under Above Ground Contact, delete "The best results will be obtained if," and replace with "Wood is to be immersed for 3 minutes or longer; if dipping is not possible, 2 brush coats, roller or spray application is to be applied..."

2. Insert the following Storage and Disposal statement on label:

Pesticide Storage

Protect pesticide containers from heat and cold. The storage area must be a 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.

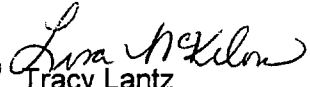
3. Revise the Precautionary Statement as per the Label Review Manual to read as follows:

Hazards to Humans and Domestic Animals
DANGER

"Corrosive. Causes irreversible eye damage . . .after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Avoid breathing mist/vapor during brush, roll, spray and dip applications . . ."

Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6415 or email address at: lantz.tracy@epa.gov, or Lisa McKelvin by telephone at (703) 308-7496 or email address at: mckelvin.Lisa@epa.gov.

Sincerely,


Tracy Lantz
for (Acting) Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

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Cunapsol-1 Wood Preservative

FOR EXTERIOR USE ONLY

[Color statement(s)]
[Use statement(s)]
[Control statement(s)]
[Other statement(s)]

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:

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ACTIVE INGREDIENTS:

Copper Naphthenate	9.08%*
Inert Ingredients:	<u>90.92%</u>
Total:	100.00%

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. *1022-518*

*Equivalent to 1% metallic copper.

Cunapsol 1 weighs approximately 8.5 lbs. per gallon.

EPA Reg. No. 1022-518 EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN
DANGER
See Back Panel for Precautionary Statements

Net Contents: 1 U.S. Quart (.9 Liters)
1 U.S. Gallon (3.785 Liters)
5 U.S. Gallons (18.925 Liters)

IBC Manufacturing Company
416 East Brooks Road
Memphis, Tennessee 38109
901-344-5350

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 eye. ▪ Call a Poison Control Center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> ▪ Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. ▪ Call a Poison Control Center or doctor for treatment advice.
<p>In case of emergency, call Chemtrec at 1-800-424-9300.</p> <p>Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.</p>	

PRECAUTIONARY STATEMENTS

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HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1022-518

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

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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.

Cunapsol-1 Wood Preservative is a multi-purpose, water-based exterior wood preservative and insecticide pre-treatment for below ground, ground contact, fresh water contact and above ground applications where either pressure-treated or non-pressure-treated wood has been used. When applied as directed, Cunapsol-1 provides protection against attack from termites and other wood boring insects and decay fungi, including mildew, mold, rot and decay organisms. It also controls warping, swelling and end checking due to its anti-wicking property, which resists moisture absorption and movement from end to end. This preservative will impart a color to wood that will fade over time, but if undesirable, can be top-coated with paint or stain.

Cunapsol-1 Wood Preservative requires no dilution before use. Use as received, following label directions.

~~When used with this product, it is advised that you do not eat, drink, or use food or feed products from the same area.~~

RECOMMENDED USES: Landscape timbers, railroad ties, fence posts, poles, pickets and rails, construction posts, foundation sills, steps, stairs, porches, siding, millwork, shakes, shingles, roofs, windows, window frames, doors, docks, piers, boats or other non-pressure-treated exterior wood exposed to moisture, weather or wood destroying insects. Also recommended for pressure-treated wood end cut protection, especially on decks.

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with COMMENTS
m EPA Letter Dated:

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Since Cunapsol-1 Wood Preservative has very low phytotoxicity, it can be used to treat wood for greenhouses, nursery flats, etc. Pretreatment only. Do not apply at sites on or near water or wetlands.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, substituted under EPA Reg. No. 1022-518

Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood to be protected against surface and termite should be treated before use in construction. Termites will not attack wood treated with this preservative.

In addition to preventing decay, blue stain, and insect attack on wood, Cunapsol-1 Wood Preservative controls warping, swelling, shrinking and end-checking caused by changes in moisture content of lumber and plywood products.

BEFORE YOU START: Make sure wood is dry and free of dust, dirt and debris. Stir or shake well before using. **IMPORTANT:** This product has a color that slowly fades with time, but can be stained or painted after 24 hours, or re-applied at any time. Always test in an inconspicuous area for color satisfaction.

APPLICATION PROCEDURES: For best results, apply when outside temperatures are between 50°F and 90°F, and when 24 hours of precipitation-free weather is expected. Apply by dip treatment, brush, roller or pump sprayer.

Below Ground, Ground or Fresh Water Contact:

Seasoned (weathered) or green (new) 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. If dipping is not possible, 2 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 wood to dry for 24 hours before installation.

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 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 installation, painting and/or staining.

COVERAGE: One gallon covers 100 – 300 sq ft (9 – 28 m²), depending upon the wood age and species, surface porosity and method of application. One quart covers 40– 50 sq. ft. (4 – 5 m²).

CLEAN-UP: Clean tools and equipment after use with soap and water.

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.

Label to include any of the following statements

ACCEPTED
with COMMENTS
in EPA Letter Dated:

(Color Statements)

- Green Wood Preservative
- Black Wood Preservative
- Brown Wood Preservative
- Cedartone Wood Preservative
- Imparts Green Color
- Imparts Black Color
- Imparts Brown Color
- Imparts Cedartone Color
- Imparts Long-Lasting, Black Color to Wood, Similar to Creosote
- Looks like Creosote
- With brown color additive
- Brown
- Cedar Color
- Imparts Brown Color to ensure complete coverage

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amended, for the pesticide,
registered under EPA Reg. No. 1022-518

(Use Statements)

- Above or Below Ground & Ground Contact
- Above or Below Ground, Ground and Water Contact
- Use above or below ground
- For wood in contact with soil and water
- Docks & Piers, Construction Posts, Fencing, and End Cuts
- End Cut Protection
- Ideal for End Cut Protection
- Landscape Ties, Fence Posts & Rails, and Construction Posts
- Construction Posts and Outdoor Decor
- Great for Small Projects
- Brush on preservative especially formulated for the coating of freshly sawn ends of pressure treated outdoor wood.
- Cedar Shake Roof Preservative
- Ground Contact Preservative
- Decks
- Fences
- Shakes
- Shingles
- Roofs
- Posts
- Pressure-Treated Wood End Cut Protection
- Exterior

- For Preserving Cedar Shake Roofs
- This product is not designed for application on decks, outdoor furniture or other structures intended for seating or heavy foot traffic.
- Wolmanized End Cut Solution is a brush-on preservative especially formulated for the coating of freshly sawn ends of pressure-treated wood products that have been surface coated with a brown stain.

(Control Statements)

- Prolongs the life of non-pressure treated wood
- Prevents termite and other insect attack
- Protects against rot and decay
- Resists mold, mildew and stain fungi
- Anti-wicking – controls moisture damage
- Stops rot, decay and insect attack
- Protects against wood rot, warping swelling, termite damage, mildew and moisture
- Kills powder post beetles, termite attack above or below the ground
- Prevents decay, warping & swelling
- Preserves Wood
- Wood Preservative
- Protects Against Decay

(Other Statements)

- Paintable and Stainable
- Deep Penetrating formula
- Easy soap and water clean-up
- Water clean up
- Note: application of product on redwood and cedar will darken wood.
- Application of this product may produce strong, lingering odor
- Ready to Use
- Cunapsol Wood Preservative
- Approved for Outdoor Wood® Lifetime Warranty
- Wolmanized® Pressure-Treated Wood End Cut Solution
- Made in USA
- Printed in USA
- Volatile Organic Compounds <350 gm./liter.
- VOS (excluding water) < 0.35 kg./liter
- VOC Content 221 g/L (1.84 lbs/gal)
- Preserve your wood and your warranty.
- Maintain the Lifespan limited 30 year warranty
- Swipe. Seal. Done.

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