

APR 15 1997

IBC Manufacturing Company  
5966 Heisley Road  
Mentor, OH 44060

Attention: Sangeeta V. Khattar  
Registrations Representative

Subject: Cunapsol-5  
EPA Registration Number 1022-522  
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".

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.

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)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

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

1022-522

# CUNAPSOL-5

## Wood Preservative

FOR EXTERIOR USE ONLY

### Ingredient Statement

**Active Ingredient:**

Copper Naphthenate.....45.4%\*

Inert Ingredients: .....54.6%

Total: .....100.0%

\*Equivalent to 5% metallic copper

Cunapsol-5 weighs approximately 8.75 lbs. per gallon

EPA Reg. No. 1022-522

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. Call a physician.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF SWALLOWED:** Drink promptly a large quantity of milk, egg white, gelatin solution, or, if these are not available, large quantities of water. Avoid alcohol. Get medical attention. Do not induce vomiting.

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

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastral lavage.

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

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

Corrosive. Causes burns and irreversible eye damage. May be fatal if inhaled. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. Wear goggles or face shield, protective clothing and rubber gloves. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

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. 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.

**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-5 is a concentrate and requires dilution with water before use. To treat wood for use in moderate decay hazard locations, dilute one volume of Cunapsol-5 with 4 volumes of water. To treat wood for use in high decay hazard locations, such as ground contact, dilute one volume of Cunapsol-5 with 1.5 volumes of water. 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.

**PARTICLE BOARD**

Cunapsol-5 is employed as a preservative for particle board, insulation board, and other wood base fiber and particle panel materials. In this use, Cunapsol-5 is mixed with furnish resin or binding agent at 3% based on dry weight of wood.

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**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-liberat~~ 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-5 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 the wood, and method of application.

Water repellents may be admixed with Cunapsol-5 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.

**RECOMMENDED FOR**

Cunapsol-5 is recommended for millwork. Original Equipment Manufacturers (OEM) may use this product on shakes and shingles prior to installation at domestic sites. 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-5 may also be used on fence posts, poles, foundation sills, decks, and all exterior wood exposed to moisture or weather prior to installation at domestic sites. Pretreatment only. Do not apply on or near water or wetlands.

Since Cunapsol-5 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-5 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-5 Wood Preservative.

Wood treated with Cunapsol-5 should not be used where it may come in contact with food, feed or potable water. See Technical Bulletin for additional uses.

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**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-5 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 treatments.

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

**IBC MANUFACTURING CO. MAKES NO WARRANTIES, EITHER EXPRESS OR IMPLIED, OTHER THAN AS SET FORTH ON THIS LABEL, AND IBC MANUFACTURING CO. DISCLAIMS ANY IMPLIED WARRANTY OR MERCHANTABILITY NOT SPECIFICALLY SET FORTH ON THIS LABEL. IBC MANUFACTURING CO. 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 MANUFACTURING CO. 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 - CuNap Labels/Cunapsol 5

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.

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Product Number: 1022-522

1. *The following language must appear on all copper or zinc naphthenate labels. Please note if any of these do not appear.*

**"For Exterior Use Only."**

**"Do not breath vapors or mist during brush, roll, spray, or 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 this product."**

**"To report complaints, or in case of accidents or medical emergencies, or for general pesticide information involving this or other pesticide products, please call the [company name] at 1-800-[number], or [Chem-Trec] at 1-800 [Chem-Trec number]."**

2. *Please note below any use pattern captured on the original label but not captured on the amended label.*


3. *Please note below any use pattern that can be interpreted as an "interior" use.*


4. *Any additional comments/questions about this label.*

*Accepted with comments.*