

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

December 13, 2004

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

Subject: Cunapsol - 5  
EPA Registration Number 1022-522  
Application Date: October 25, 2004  
EPA Received Date: October 28, 2004

Dear Ms. Early:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

**Proposed Amendment**

- Revised labeling

**Conditions**

Revise the label as follows:

1. Revise the Precautionary Statements by adding the following statement:

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

2. Revise the Environmental Hazards Statement by changing the statement "...public waters unless..." to read "...other waters unless..."

**CONCURRENCES**

SYMBOL	S10C							
SRNAME	J&A							
DATE								

**Other Comments**

It is acceptable to separate the residential and industrial Storage and Disposal directions on the product's commercial label for marketing purposes.

**General Comments**

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Heyward  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510 C)

**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**

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 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 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 to by a Poison Control Center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
In case of emergency, call Chemtrec at 1-800-424-9300.  Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.	

ACCEPTED  
 with COMMENTS  
 EPA Letter Dated:

Manufactured by:  
**IBC Manufacturing Company**  
 416 East Brooks Road  
 Memphis, TN 38109

DEC 13 2004

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1022-522

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**PRECAUTIONARY STATEMENTS**

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

Corrosive. Causes burns and irreversible eye damage. May be harmful if inhaled. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, protective clothing and rubber gloves. 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.

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.

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**ENVIRONMENTAL HAZARDS**

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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 of Regional Office of the EPA.

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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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**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.

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 1 to 3% based on dry weight of wood.

**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 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.

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**RECOMMENDED FOR**

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Cunapsol-5 is recommended for millwork windows, window frames, doors, siding, shakes & shingles, trellises fence pickets and rails, arbors and beverage cases. ~~Original Equipment Manufacturers (OEM) may use this product on shakes and shingles prior to installation at domestic sites.~~ Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood.

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**

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

**PESTICIDE 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 – COMMERCIAL / INDUSTRIAL:**

**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.

**DISPOSAL – RESIDENTIAL / HOMEOWNER:**

**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.

**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.