

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

MAY 18 2010

OFFICE OF
PREVENTION, PESTICIDE
AND TOXIC SUBSTANCE

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

Subject: **Cunapsol-5**
EPA Registration No. 1022-522
Application Date: February 18, 2010
Receipt Date: February 25, 2010

Dear Ms. Watson:

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

Proposed Amendment:

- Update label as PR Notice 2007-4

Conditions

Revise label as follows:

- 1.) According to PRN 2001-1, First Aid Statements must be organized so that the most severe routes of exposure, as demonstrated by the toxicity classification, are listed first. Therefore reorder the First Aid Statement as follows:
 1. If in eyes
 2. If on skin or clothing
 3. If inhaled
 4. If swallowed
- 2.) You must update the 2nd and 7th statements listed under the Precautionary Statements
- 3.) ~~Delete the term "recommend" and replace "should" with the term "must" on page 4 to be in compliance with PRN 2000-5, Mandatory Labeling.~~
- 4.) Revise the subheading "Container Disposal" to read "Container Handling" such that it is in agreement with PR Notice 2007-4.
- 5.) ~~On page 5 of your label, under subheading "Container Handling" delete the second instruction referencing that cleaning is the responsibility of the retailer as it is a repetitive statement.~~

CONCURRENCES

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- 5.) You must include the following Residential Storage and Disposal statements such that it is in agreement with PR Notice 2007-4:

[Residential] Storage and Disposal:

Store in secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use. Nonrefillable container. Do not use or refill this container. Offer for recycling. Discard if not available place container in trash.

- 6.) Add Storage and Disposal heading for Commercial/Industrial Containers. Also add the "General Statement" immediately after the heading "Storage and Disposal":

[Commercial Industrial]

Storage and Disposal

Do not contaminate food, feed, or water by storage disposal.

Pesticide Storage:

Pesticide Disposal:

Container Handling:

General Comment:

A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at grigsby.stacey@epa.gov during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Handwritten signature of Jacqueline McFarlane

Jacqueline McFarlane
(Acting) Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: EPA stamped accepted labeling

CONCURRENCES

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CUNAPSOL-5
Wood Preservative

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY 18 200

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

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	
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. • Call a Poison Control Center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 – 20 minutes. • Call a Poison Control Center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a Poison Control Center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a Poison Control Center or doctor. • Do not give anything by mouth to an unconscious person.
<p>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.</p>	
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

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

PRECAUTIONARY STATEMENTS

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.

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 other 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 AND CHEMICAL HAZARDS

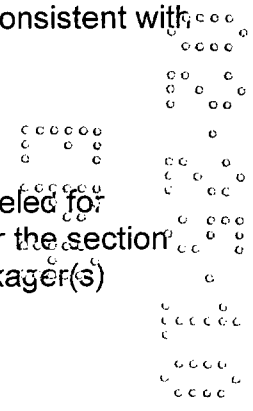
Do not use or store near heat or open flame.

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.

[[[[[OPTIONAL LANGUAGE FOR ONE-QUART AND ONE-GALLON F-STYLE JUGS):

DISPENSING INSTRUCTIONS:

In order to ensure that the product does not glug or drip, remove cap and hold the jug so that the pour opening is to the one side. (See diagram below). Gently lift the bottom of the jug, while holding the top level, and tip the spout forward. Pour slowly, so that product pours in a continuous, coherent stream. When pouring is complete, return the jug to the upright position and replace the cap.



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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.

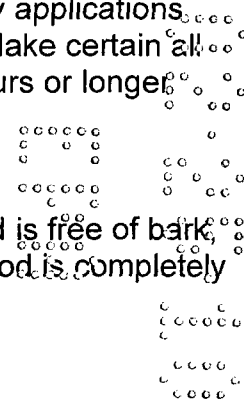
FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING

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.

RECOMMENDED FOR

Cunapsol-5 is recommended for windows, window frames, doors, siding, shakes & shingles, trellises, fence pickets and rails, arbors and beverage cases. 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. 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.

States may have more restrictive requirements regarding qualification of person using this product. Consult the structural pest control regulatory agency of your state prior to the use of this product.

Wood treated with Cunapsol-5 should not be used where it may come in contact with food, feed or potable water.

STORAGE AND DISPOSAL

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

