

1022-522

11/08/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 8 2012

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

Subject Cunapsol-5
EPA Registration No 1022-522
Amendment Date October 2, 2012
EPA Receipt Date October 2, 2012

Dear Ms Watson

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable

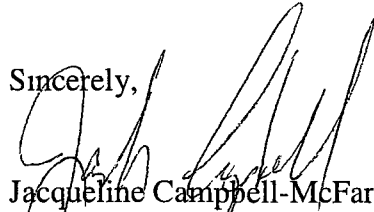
Proposed Amendment

- Update label in response to Agency letters dated May 18, 2010 and June 22, 2010

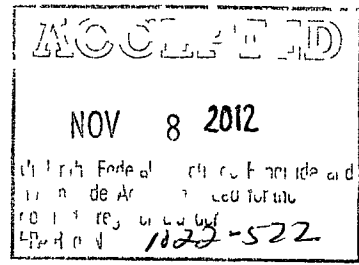
General Comments

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

Should you ons concerning this letter, please contact Stacey Grigsby at (703) 305-6440 or by email at grigsby stacey@epa gov

Sincerely,

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

Enclosure Stamped Label



**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	
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 of 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 irreversible eye damage and skin burns 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 and before eating, drinking, chewing gum, using tobacco or using the toilet 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 of 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.

USE SITES

Cunapsol-5 is for use on 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 must 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 must not be used where it may come in contact with food, feed or potable water.

STORAGE AND DISPOSAL (Residential)

Store in a secure, well-ventilated area protected from extreme temperatures Do not transfer to unmarked containers Keep container closed when not in use Call local solid waste agency or 1-800-CLEANUP for disposal instructions Never place unused product down any indoor or outdoor drain Nonrefillable container Do not refill or reuse this container Offer for recycling if available If not, discard in trash

STORAGE AND DISPOSAL (Commercial/Industrial)

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

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

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 HANDLING Nonrefillable Container Do not reuse or refill this container Triple rinse as follows Fill container ¼ 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

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