

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 1997

IBC Manufacturing Company  
5966 Heisley Road  
Mentor, OH 44060

Attention: Sangeeta V. Khattar  
Registrations Representative

Subject: Cunapsol-2  
EPA Registration Number 1022-523  
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".

2. The net contents should be declared on the label or on the container.

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.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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)

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

# CUNAPSOL-2

## Wood Preservative

### FOR EXTERIOR USE ONLY

*Ready-to-Use*

APR 15 1997

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

1022-523

### Ingredient Statement

**Active Ingredient:**

Copper naphthenate .....18.16%\*

**Inert Ingredients:** .....81.84%

**Total:** .....100.00%

\*Equivalent to 2% metallic copper

EPA Reg. No. 1022-523

EPA Est. No. 1022-TN-1

## KEEP OUT OF REACH OF CHILDREN

## WARNING

See Precautionary Statements

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

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**PRECAUTIONARY STATEMENTS**

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**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****WARNING**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear goggles, face shield or safety glasses when handling. Wash thoroughly with soap and water after handling. Causes skin irritation. Do not get on skin or on clothing. Remove contaminated clothing and wash before reuse. Harmful if swallowed.

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.

**FIRST AID****STATEMENT OF PRACTICAL TREATMENT**

**IF IN EYES:** Immediately flush with large quantity of water and get medical attention.

**IF ON SKIN:** Flush with water. Remove and wash contaminated clothing before reuse.

**IF SWALLOWED:** Drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.

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**ENVIRONMENTAL HAZARDS**

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This product is toxic to fish. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean highwater mark, or wetlands. Do not contaminate water when disposing of equipment washwaters.

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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 formulator(s) or repackager(s) telephone number.

Cunapsol-2 requires no dilution before use. Use as received, following label directions. 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.

**FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING**

COVERAGE: One gallon covers 100 - 300 sq. ft. depending upon the wood species, porosity of the wood, and method of application.

**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 liberal 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-2 for 12-48 hours or until the sapwood is completely penetrated.

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**RECOMMENDED FOR**

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Windows, window frames, doors, stairs, porches, siding, shingles, steps, ~~interior trim, wall paneling, furniture, fence pickets, fence rails, furring strips, flooring and beverage cases.~~

Also for use on fence posts, poles, foundation sills, decks, boats and all exterior wood exposed to moisture or weather. Pretreatment only. Do Not apply at sites on or near water or wetlands.

Powder post beetles which invade ~~furniture, flooring and structural~~ lumber are controlled by application of this preservative. These insects will not attack the treated wood.

Since Cunapsol-2 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 this preservative 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-2 Wood Preservative.

Wood treated with Cunapsol-2 should not be used where it may come in contact with food, feed, or potable water. Do not use water collected from treated wood for potable water.

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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 DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**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.

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**WARRANTY STATEMENT AND DISCLAIMER**

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Proper application is critical to the effectiveness of this product, however, when applied and used according to this label, this product is capable of protecting wood as described above. 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 previous and subsequent treatments.

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller that this product conformed to its chemical description and was reasonably fit for the purposes stated on the label when used in accordance with Seller's directions under normal conditions of use and directions. **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.** In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material on which a claim is made.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product, weather conditions, moisture conditions or other environmental conditions, and those conditions which are outside of the ranges that are generally recognized as being conducive to good application practice.

File: Special Review - CuNap Labels/Cunapsol 2 1022-523

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.