

DEC 28 1992

Michael H. West  
IBC Mfg. Co.  
416 East Brooks Road  
Memphis, TN 38109

Dear Mr. West:

Subject: Change Signal Word to Warning  
M-GARD S520  
EPA Registration No. 1022-528  
Your Submission Dated December 2, 1992

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Modify the Environmental Hazards Section to include the following statements:

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment washwaters.

b. The Signal Word, WARNING, Keep Out Of The Reach Of Children, and See Side Panel For Additional Precautionary Statements must appear on the front panel. The front panel bears the product's Brand Name and Ingredient Declaration.

c. Under the Ingredient Declaration add the substatement:

Contains Petroleum Distillates

d. Include the following statements in the hazards to humans and domestic animals section:

Causes skin and eye irritation. Wear goggles, face shield or safety glasses. Remove contaminated clothes and wash before reuse. Prolonged or repeated skin contact may cause allergic reaction in some individuals.

2.042

e. Update the Statements of Practical Treatment to include the following statements:

If inhaled: Remove to fresh air. If not breathing, give artificial respiration preferably mouth-to-mouth

If in eye: Flush with plenty of water. Get medical attention if irritation persists.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

*CS*

Cynthia Giles-Parker  
Product Manger (22)  
Fungicide Herbicide Branch  
Registration Division (H7505C)

Enclosure

# COPPER NAPHTHENATE CONCENTRATE 8%

## ACTIVE INGREDIENT

Copper naphthenate .....	68.0%*
INERT INGREDIENTS .....	32.0%
TOTAL .....	100.0%

\*Equivalent to 8% metallic copper

Conforms to Government Specification MIL-M17231A.

BATCH NO \_\_\_\_\_

NET CONTENTS: \_\_ 5 GAL (84062080) \_\_ 55 GAL (84062001) \_\_ BULK (89051001)

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### WARNING

Causes skin irritation. Do not get in eyes, on skin, or on clothing. Harmful if swallowed or inhaled. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling.

#### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of wastes.

## DIRECTIONS FOR USE

*It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.*

Copper Naphthenate Concentrate 8% must be diluted before use with solvents such as mineral spirits, diesel fuel, mineral oil, etc., or solvents meeting AWP Standard P-9\* to protect treated items against deterioration by stain, mold and decay fungi, moss, mildew, termites, wood-boring beetles and carpenter ants.

Copper naphthenate solutions may be applied to cellulosic textiles and cordage products such as tents, awnings, tarpaulins, canvas products, ropes, nets, burlap for wrapping root systems, etc. However, Copper Naphthenate should not be used to treat textiles intended for uses resulting in repeated skin contact or contact with food or feed. Effective application results in 1 percent copper metal remaining in the treated product. The level of treatment is usually attained by dipping or soaking the product in a

solution containing 2% copper metal made by mixing Copper Naphthenate Concentrate 8% with a solvent such as mineral spirits.

Copper Naphthenate solutions may be applied to wood products such as lumber, posts, poles, siding, furring strips, boats, piers, docks, boxes, roof shakes and shingles, porches, steps, sub-flooring, fences pickets and rails, arbors, trellises, beverage cases, landscape timbers, wooden seedling trays, plant and flower boxes, etc. Effective application rates vary according to severity of conditions to which the treated product is exposed. Wood to be treated should be thoroughly seasoned and free of bark.

For above ground exposure, brush, spray or dip applications of solutions containing 1 or 2 percent copper metal are adequate for wood in non-critical applications. For wood used above ground in critical (structural) applications or under more severe exposure conditions where it is subject to extended periods of wetting, extended soaking or pressure treatment in accordance with AWP Standards\* with a solution containing 0.5 to 1.0 percent copper metal to a retention in the wood of .04 to .06 pounds copper metal per cubic foot is recommended.

For wood used in ground contact, extended soaking or pressure treatment in accordance with AWP Standards\* with a solution containing .75 to 1.0 percent copper metal to a retention in the wood of .04 to .10 pounds copper metal per cubic foot is recommended.

Copper naphthenate solutions may be used for internal or external remedial treatment of standing wood poles, piling and other existing structures.

Copper Naphthenate Concentrate 8% may be used by formulators as an active ingredient source for ready-to-use pesticide products registered with the U.S. Environmental Protection Agency.

\*American Wood Preservers' Association

## WARRANTY AND LIMITATION OF DAMAGES

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such 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 EXCEPT IN WRITING WITH A SPECIFIC REFERENCE TO THIS WARRANTY. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

## STORAGE

PROHIBITIONS: Do not store in areas where it may be fed by storage or disposal.

PESTICIDE DISPOSAL: Containers should be disposed of in accordance with procedures approved by federal, state and local authorities.

CONTAINER DISPOSAL: Containers should be disposed of in accordance with procedures approved by state and local authorities.

GENERAL: Consult state and local authorities for approval.

## KEEP OUT OF REACH OF CHILDREN

## WARNING

## STATEMENT OF WORKING CONDITIONS

IF ON SKIN: Wash with soap and water. Get medical attention if irritation persists.  
IF INHALED: Remove to fresh air. Get medical attention if symptoms persist.  
IF IN EYES: Wash immediately with water. Get medical attention if irritation persists.  
IF SWALLOWED: Do not induce vomiting. Get medical attention.

SEE SIDE PANEL FOR PRECAUTIONS

IBC MANUFACTURER  
416 East Broadway  
Memphis, TN 38103

ACCEPTED  
with COMMENTS  
In EPA Letter Dated: \_\_\_\_\_

DEC 28 1997

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

1022-568

4-1-21 1022-568