



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

APR 19 1996

Sangeeta V. Khattar  
IBC Mfg. Co.  
416 East Brooks Road  
P.O. Box 9158  
Memphis, TN 38109

Dear Ms. Khattar:

Subject: Revised Labeling  
Copper Naphthenate Concentrate 8%  
EPA Registration No. 1022-528  
Your Submission Dated April 12, 1996

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. Since this product may be sprayed or brushed outdoors on roofs, shingles, fence pickets and rails in addition to the industrial treatment of wood, modify the Environmental Hazards Section to include the following statements prior to the discharge 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. If the Precautionary Statements section does not appear on the front panel, you must add a referral statement similar to the following:

See side panel for additional precautionary statements

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

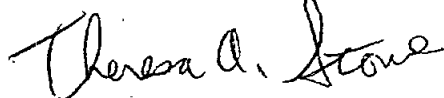


Recycled/Recyclable  
Printed on paper that contains  
at least 75% recycled fiber

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

Sincerely yours,



Theresa A. Stowe  
Acting Team Leader  
Product Manager (22)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

Enclosure

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
APR 19 1996

Net Contents:

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
1022-528

# COPPER NAPHTHENATE CONCENTRATE 8%

## Ingredient Statement

<b>Active Ingredient:</b>	
Copper naphthenate.....	68.0%*
<b>Inert Ingredients:</b> .....	32.0%
<b>Total:</b> .....	100.0%

Contains Petroleum Distillates

\* Equivalent to 8% metallic copper  
Conforms to Government Specification MIL-M17231A

EPA Reg. No. 1022-528

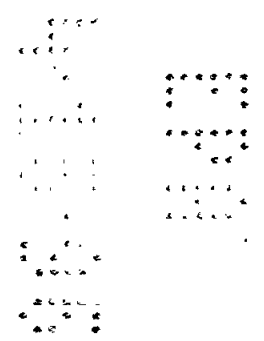
EPA Est. No. 1022-TN-1

**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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**COPPER NAPHTHENATE  
CONCENTRATE 8%**

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**PRECAUTIONARY STATEMENTS**

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**Hazards to Humans and Domestic Animals**

**WARNING**

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. 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.

**STATEMENT OF PRACTICAL TREATMENT**

- IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.
- IF INHALED:** Remove to fresh air. If not breathing, give artificial respiration preferably mouth-to-mouth.
- IF IN EYES:** Flush with plenty of water. Get medical attention if irritation persists.
- IF SWALLOWED:** Do not induce vomiting. Get medical attention.

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**ENVIRONMENTAL HAZARDS**

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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 Environmental Protection Agency.

**COPPER NAPHTHENATE  
CONCENTRATE 8%**

**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 AWWPA 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 terrestrial use cellulosic textiles and cordage products such as tents, awnings, tarpaulins, canvas products, ropes, and nets (except fishnets). However, Copper Naphthenate should not be used to treat textiles intended for uses resulting in repeated skin contact or contact with food or feed or potable water. Effective application results in 1% 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, fence pickets and rails, beverage cases; and for ornamental plantings landscape timbers, wooden seedling trays, plant and flower boxes. Wood treated with Copper Naphthenate Concentrate 8% is NOT suitable for food garden uses. 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. Do Not apply at sites on or near water or wetlands.

**Wood treated with Copper Naphthenate Concentrate 8% should not be used where it may come in contact with food, feed or potable water.**

**ABOVE GROUND CONTACT**

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 AWWPA 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.

**GROUND CONTACT**

For wood intended for ground contact, treat according to AWWPA Standards\* with a solution containing 0.75 to 1.0 percent copper metal to a retention in the wood of .04 to .10 pounds copper metal per cubic foot.

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

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**COPPER NAPHTHENATE  
CONCENTRATE 8%**

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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.

**STORAGE:** Store at temperatures between 0°F and 120°F. Store in original container only. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide concentrate, solution, or rinsate that cannot be used or reprocessed should be disposed of according to procedures approved by Federal, State, or local authorities.

**METAL CONTAINERS:** 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.

**PLASTIC CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill; or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**GENERAL:** Consult federal, state or local disposal authorities for approved alternative procedures.

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**WARRANTY STATEMENT AND DISCLAIMER**

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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.

**Revised Label Submitted to EPA for Review: April 12, 1996**