

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 17 1997

IBC Manufacturing Company  
5966 Heisley Road  
Mentor, OH 44060

Attention: Sangeeta V. Khattar  
Registrations Representative

Subject: Copper Naphthenate Concentrate 8%  
EPA Registration Number 1022-528  
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.

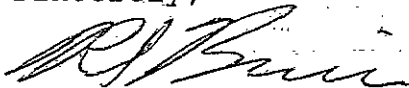
- 1. Revise the Environmental Hazards to read as follows:

"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".

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.

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)

CONCURRENCES

SYMBOL	SURNAME	DATE					

2016

Net Contents:

# COPPER NAPHTHENATE CONCENTRATE 8%

Preservative for Textiles and Wood

FOR EXTERIOR USE ONLY

### 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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

APR 17 1997

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

See Back Panel for Additional Precautionary Statements.

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

1022-528

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.

Do NOT breathe vapors or mist during brush, roll, 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 this 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.

**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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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 high water mark. Do not contaminate water by disposal of equipment washwaters.

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.

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**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.

Use only the application method specified for a particular use.

Copper Naphthenate Concentrate 8% must be diluted before use with solvents such as mineral spirits, diesel fuel, mineral oil, etc., or solvents meeting AWWA 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 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.

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

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.

**FOR TEXTILE TREATMENT**

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.

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

**ABOVE GROUND CONTACT**

For above ground exposure, brush, roller, spray or dip applications of solutions containing 1 or 2 percent copper metal are adequate for wood in non-critical applications. Dilute Copper Napthenate Con. 8% with 3.0-3.8 volumes of solvent (depending upon density of diluent) to obtain 2% copper metal or 7.5-8.0 volumes of solvent (depending upon density of diluent) to obtain 1% copper metal.

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

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**COPPER NAPHTHENATE  
CONCENTRATE 8%**

**FOR PRESSURE TREATMENT**

**ABOVE GROUND CONTACT**

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 AWPA 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 AWPA 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.

**FOR REMEDIAL TREATMENTS**

Copper Naphthenate solutions of 2% copper metal may be used for internal or external remedial treatment of standing wood poles, piling and other existing structures.

\*American Wood-Preservers' Association

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**COPPER NAPHTHENATE  
CONCENTRATE 8%**

**STORAGE AND DISPOSAL**

**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.

**CONTAINER DISPOSAL:**

**PLASTIC CONTAINERS:** 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.

**WARRANTY STATEMENT AND DISCLAIMER**

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.

File: Special Reiew - CuNap Labels/Copper Naphthenate 8% 1022-528

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.