

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 1997

IBC Manufacturing Company  
5966 Heisley Road  
Mentor, OH 44060

Attention: Sangeeta V. Khattar  
Registrations Representative

Subject: CuRap 20  
EPA Registration Number 1022-536  
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 not acceptable for the reasons given below.

1. The following language must appear on all copper or zinc naphthenate labels:

"For Exterior Use Only"

"Do not breath vapor or mist during brush, roll, spray, or 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".

2. Revise the Environmental Hazards to read as follows:

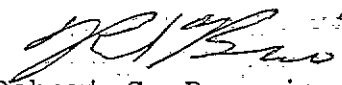
"This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority 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".

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:

Net Contents:

APR 15 1997

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

**CuRAP® 20**

**WOOD PRESERVATIVE PASTE**

1022-536

**EFFECTIVE GROUNDLINE TREATMENT  
FOR CONTROL OF DECAY AND INSECTS**

**FOR COMMERCIAL APPLICATOR USE ONLY  
For Sale Only In 50 Pound Or Greater Containers**

**Ingredient Statement**

**Active Ingredients:**

Copper naphthenate.....	18.16% *
Borax (sodium tetraborate decahydrate).....	40.00%
<b>Inert Ingredients:</b> .....	<b>41.84%</b>

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

\*Equivalent to 2% metallic copper.  
U.S. Patented.

EPA Reg. No. 1022-536

EPA Est. No. 1022-TN-1

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

<p><b>Statement of Practical Treatment</b></p> <p><b>If IN EYES:</b> Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes.</p> <p><b>If ON SKIN:</b> Wash thoroughly with plenty of soap and water. Get medical attention.</p> <p><b>If SWALLOWED:</b> Call a physician or poison control center. Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol.</p> <p><b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate use of gastric lavage.</p> <p>See back panel for additional precautionary statements.</p>
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**ISK Biosciences Corporation  
Industrial Biocides Division  
6075 Poplar Avenue  
Memphis, TN 38119**

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER**

Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after skin contact and before eating, drinking, use of tobacco products, or using restrooms.

Applicators must wear gloves impervious to the wood treatment formulation (e.g., polyvinyl chloride (PVC) or neoprene) in all situations where dermal contact is expected (e.g., during the actual application process and when handling freshly treated wood).

Applicators should wear long sleeved shirts, long pants, and an impervious apron during the application process and all situations where dermal contact is expected. Remove contaminated clothing and wash before reuse. Launder work clothing separately from other household clothing. Dispose of worn-out work clothing and work shoes or boots in any general landfill, in the trash, or in any other manner approved for pesticide disposal.

In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300.

**ENVIRONMENTAL HAZARDS**

The pesticide is toxic to fish. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

**PHYSICAL AND CHEMICAL HAZARDS**

Do not use or store near heat or open flame.

**CuRap 20**

**DIRECTIONS FOR USE**

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

**CuRap 20** is intended for use as a remedial treatment for standing wood utility poles and as a primary or remedial treatment for wooden structures standing in the ground that are susceptible to attack by decay and soft rot fungi, termites, carpenter ants, or wood boring beetles.

**CuRap 20** may be applied to form a layer 1/16-inch to 3/8-inch thick by brush, trowel, or by application to Pol- Nu Paper. A POL-NU BANDAGE MAKER can also be used to prepare a BANDAGE. Use a trowel to apply **CuRap 20** to deep checks in wood or fill a caulking gun with the preservative and apply liberally.

For utility poles, pilings, posts, and other wooden structures standing in the ground, excavate the soil away from the structure to a depth of about 18 inches. Wire brush or scrape the surface to remove adhering soil and remove any damaged wood. The structure should be inspected for internal decay and insect attack by taking increment borings. If internal damage is found, early replacement or stubbing is recommended. Plug bore holes with locust plugs or treated wood plugs.

BANDAGES may be used to cover groundline areas of structures in bands typically 18 to 22 inches in height. **CuRap 20** should be applied to at least cover the wood surface 4 inches below the last evidence of decay and 3 inches above the groundline. More than one BANDAGE may be used in special cases where the structure spans a height greater than 22 inches, such as on hillsides or the circumference of the structures exceeds the BANDAGE length. Overlap ends of the BANDAGE to insure complete coverage of pole with preservative paste. Wrap BANDAGE tightly, stapling or nailing it in place. Wrap top with 3" black reinforced tape allowing tape to overlap bandage and staple into place. Back-fill and tamp dirt firmly, mounding within 1-inch of BANDAGE top. Do not back-fill above top edge of BANDAGE.

Other wooden structures, such as sills, headers, joists and other subfloor members, boats, bridge members, and railroad tie surfaces may be treated with **CuRap 20**. Apply by brush, trowel, caulk gun, or BANDAGE. Heavier application at points where condensation is likely to occur, where moisture may collect, and where end grain is exposed or butts against concrete or other wood members is recommended.

For control of internal decay of utility poles, drill 3/4-inch holes in each quarter of the pole near the areas of the pole where internal decay protection is required. Do not drill holes nearer than two feet of each other in the vertical direction. These holes should be at a 45 degree angle downward and to a depth equal to or slightly greater than the radius of the pole. Pack the preservative paste into the holes leaving enough room to insert treated wood plugs into the holes as a cap.

**RAILROAD TIES**

**Adzed Railroad Ties:** **CuRap 20** may be applied to adzed railroad ties by brush, towel, or roller at a thickness of 1/8-inch. The adzed -treated area should be covered with a tie-plate the same size as the adzed area, leaving no exposed preservative.

**Wood treated with CuRap 20 should not be used where it may come in contact with food, feed or potable water.**

**STORAGE AND DISPOSAL**

**PROHIBITIONS:** Do not contaminate water, food, or feed by storage or disposal.

**STORAGE:** Store away from food or feed in a secure, well-ventilated area protected from extreme temperatures. Do not allow to freeze. 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 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 DISPOSAL:**

**Metal Container:** 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.

**Metal Drums:** Completely empty liner. Dispose of liner in a sanitary landfill if allowed by state and local authorities. If drum is damaged and cannot be reused, dispose of in the same manner. **Plastic and paper CuRap 20 packaging materials may be used as wraps to cover the CuRap 20 treatment around the poles.** Otherwise, dispose of empty bag(s) in a sanitary landfill or by incineration if allowed by State and local authorities.

**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.** 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.

CuRap® is a registered trademark of ISK Biosciences Corporation.

File: Special Review - CuNap Labels/CuRap 20 1022-536

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.