



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

October 13, 2004

Gail Early
Registrations Representative
IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Subject: CuRap 20
EPA Registration No. 1022-536
Application Date: October 6, 2004
Receipt Date: October 6, 2004

Dear Ms. Early:

This Acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

- Removing the requirement for a respirator which was added in error

General Comment:

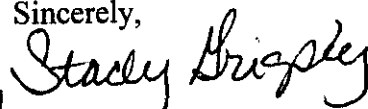
Based on a review of the material submitted the following comment applies.

The notification is acceptable. A copy of the notification has been inserted in your file for future reference.

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Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Stacey Grigsby at (703) 305-6440.

Sincerely,



tl
Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-536	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CuRap 20	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 E. Brooks Rd. Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification: Removing the requirement for a respirator which was added in error. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted	If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt _____ No. per container _____	

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container _____

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Gail Early	Title Registrations Representative	Telephone No. (Include Area Code) 901-344-5316
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Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature
Gail Early

3. Title
Registrations Representative

4. Typed Name
Gail Early

5. Date
October 6, 2004

6. Date Application Received (Stamped)

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Net Contents:

**CuRAP® 20
WOOD PRESERVATIVE PASTE
FOR EXTERIOR USE ONLY**

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

**FOR COMMERCIAL APPLICATOR USE ONLY
FOR SALE ONLY IN 36, 42, 50 AND 300 POUND CONTAINERS**

NOTIFICATION
Date Reviewed: 10-13-04
Reviewed By: S.G. Riggsby

Ingredient Statement

Active Ingredients:

Copper naphthenate.....18.16% *
Borax (sodium tetraborate decahydrate).....40.00%

Inert Ingredients:41.84%

Total: 100.00%

*Equivalent to 2% metallic copper.

Covered under IBC Manufacturing Company U.S. Patent No. 5,084,280.

EPA Reg. No. 1022-536

EPA Est. No. 1022-TN-1

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID	
IF SWALLOWED:	Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told by a Poison Control Center or doctor.
IF ON SKIN OR CLOTHING:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes. Call Poison Control Center or doctor for treatment advice.
IF IN EYES:	Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center or doctor for treatment advice.
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a Poison Control Center or doctor for further treatment advice.
IN CASE OF EMERGENCY, CALL CHEMTREC AT 800-424-9300.	
Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate use of gastric lavage.	

See side panel for additional precautionary statements.

**IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109**

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CuRap 20

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage or skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment (PPE):

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 impermeable 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.

Handlers must wear:

- Goggles or face shield
- Coveralls worn over long-sleeved shirt and long pants
- Chemical resistant gloves (such as Barrier Laminate, Butyl Rubber, Neoprene Rubber, Nitrile Rubber) shoes plus socks.

User safety recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- User should remove clothing immediately if pesticide gets inside.
- Then wash thoroughly and put on clean clothing.

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

ENVIRONMENTAL HAZARDS

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.

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CuRap 20

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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 should be applied to form a layer 1/16-inch thick by brush, trowel, or by application to Poi-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.

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.

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STORAGE AND DISPOSAL

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

PESTICIDE 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 to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. 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. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.

CuRap® is a registered trademark of ISK Americas Incorporated.