JUN 1 8 2001

Ms. Gail Early **IBC Manufacturing Company** 416 East Brooks Rd. Memphis, TN 38109

Dear Ms. Early:

Subject:

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Revised labeling

IPBC RTU

EPA Registration No. 1022-540 Your submission of April 6, 2001

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. Please note that this product contains uses for wood preservative. A use that was not supported by data (Exposure) under the IPBC RED. We inadvertently omitted wood preservative in EPA letter dated February 20, 2001. Therefore, the subject product is not being reregistered at this time due to insufficient exposure data to make reregistration eligibility decision based on its use pattern for "Wood Preservative" and not "Textiles".

A stamped copy is enclosed for your records.

If you have any questions concerning this letter, please contact me at (703) 308-6422 or Portia Jenkins at (703) 308-6230.

Sincerely yours,

Adam Heyward

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510C)

CONCURRENCES						
SYMBOL Enclosure						
SURNAME		1	-	<u></u>		
DATE						,
EPA Form 1320-1A (1/90)	1	Printed on Recycled	Paper :	 	OFFICIA	L FILE COPY

Net Contents:

IPBC-RTU

WATER-REPELLENT WOOD PRESERVATIVE

Interior or Exterior Use

Ingredient Statement

Active Ingredient: 3-Iodo-2-propynyl butyl carbamate	0.5%
Inert Ingredients:	
Total:	100.0%
This product contains Petroleum Distill	lates.
EPA Reg. No. 1022-540	EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

WARNING

AVISO!

See back panel for additional Precautionary Statements.

with COMMENTS in EPA Letter Dated: IBC Manufacturing Company 416 East Brooks Road P.O. Box 9158 Memphis, TN 38109-0158

Under the Rederal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1022-540

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PRECAUTIONARY STATEMENTS

FIRST AID

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a 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, the continue rinsing. Call a Poison Control Center or doctor for treatment advice.

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 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 1-800-424-9300.

Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

Hazards to Humans and Domestic Animals

WARNING

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Causes skin irritation. Causes moderate eye irritation. Do not get on skin or on clothing. Avoid contact with eyes. Wear protective eye glasses. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT:

Handlers must wear:

- Goggles or face shield
- Coveralls worn over long-sleeved shirt and long pants
- Chemical resistant gloves (suah as Barrier Laminate, Neoprene Rubber, Nitrile, Rubber Vitron)
- Shoes plus socks
- In addition, Mixers / loaders and persons cleaning equipment must wear chemical, resistant apron

User Safety Recommendations:

- User 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.
- User should remove personal protective equipment immediately after handling this product. Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly.

ENVIRONMENTAL HAZARDS

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This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge this product to sewage system without previously notifying treatment plant authority. For guidance contact your State Water Board or regional office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Combustible: Do not use, pour, or spill near heat or open flame. In case of fire, use water spray, foam, carbon dioxide, or dry chemical. Observe OSHA limits on employee exposure to air contaminants.

DIRECTIONS FOR USE

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

RECOMMEND USES: IPBC RTU is an effective wood preservative for control of decay producing fungi, mildew, surface mold and staining fungi. It is recommended for shingles (not asbestos), shakes, clapboards, smooth or rough-cut siding, decks, porches, railings, flat beds, millwork, trellises, and fence pickets and boards. IPBC RTU is not recommended for use on primed or previously painted surfaces. This product can be used for all above ground applications. Do not use this product where any portion of the treated wood will be below ground. It may be used as a booster or adjunct to pressure treated wood where the wood is to be used on the ground's surface (e.g., ornamental or landscape timbers). Do not use on wood that will be in contact with food, feed, or potable water or where prolonged dermal (skin) contact is likely. Due to the presence of petroleum distillates, do not use this product where dairy cattle or livestock can come in contact with the treated wood.

IPBC-RTU WATER-REPELLENT WOOD PRESERVATIVE

Wood rot protection of interior use wood is only needed on wood which is subject to frequent or prolonged wetting (e.g., condensation, rain seepage, etc.)

SURFACE APPLICATION: All surfaces must be dry, well cured and cleaned of dust, dirt, or any other contaminants that might affect performance.

APPLICATION: Wood should be dry, unpainted, well seasoned, and bark free. Cut, machine, and sand wood prior to treatment if possible. If not, liberally apply two coatings of preservative to all joints, cracks, cut ends, holes or other openings.

For DIP Treatment, best results will be obtained if wood to be treated is immersed for 3 minutes or longer. Do not undertreat. Keep the dip solution clean from debris, sawdust, or rainwater.

If COATING, apply two coatings with a brush, sprayer, or roller. Allow at least one hour between applications. Make certain all areas are fully treated to get maximum benefit. Allow 24 hours or longer after application of the preservative prior to painting. Less paint is needed over wood treated with this water-repellent preservative.

Brush, spray, and roller applications often result in splashing or dripping. Cover desirable plants and shrubs to avoid possible injury.

Wear an approved NIOSH/MSHA paint spray respirator when spraying IPBC RTU, for a continued and prolonged use, and for frequent use of this product. Do not apply IPBC RTU in any confined area where spray mist and vapors may concentrate.

RETREATMENT INTERVAL: For best results and uniformity of appearance, inspect the treated wood product annually to evaluate the effects of the conditions of exposure, and retreat as necessary where conditions have results in deterioration of appearance or initiation of attack by wood destroying organisms and fungal attack.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a secure, well-ventilated area protected from extreme temperatures. Do not store near excessive heat.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, 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 Representatiave at the nearest EPA Regional Office for guidance.

IPBC-RTU WATER-REPELLENT WOOD PRESERVATIVE

CONTAINER DISPOSAL:

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 CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration.

BULK CONTAINERS (TOTE TANKS): DO NOT rinse container. Return empty container in compliance with Department of Transportation Regulations to point of purchase for refill.

WARRANTY STATEMENT AND DISCLAIMER

Proper application is critical to the effectiveness of the product; however, when applied and used according to this label, IPBC RTU is capable of protecting wood not in contact with the soil. The actual life of the treatment will be affected by the conditions of the wood when treated, the species of wood, the type of exposure, and previous and subsequent treatments.

READ THE LABEL THOROUGHLY BEFORE USE, COMPLY WITH ALL DIRECTIONS, AND USE COMMON SENSE HANDLING.

IBC MANUFACTURING COMPANY MAKES NO WARRANTIES, EITHER EXPRESSED OR IMPLIED, OTHER THAN WHAT IS SET FORTH ON THE LABEL, AND DISCLAIMS ANY IMPLIED WARRANTY OR MERCHANTABILITY NOT SPECIFICALLY SET FORTH ON THIS LABEL. IBC MANUFACTURING COMPANY SHALL NOT BE RESPONSIBLE FOR ANY PERSONAL INJURY OR PROPERTY DAMAGE, OR THE TYPE RESULTING FROM FAILURE TO FOLLOW DIRECTIONS FOR USE, WARNINGS AND PRECAUTIONARY LANGUAGE ON THIS LABEL. IBC MANUFACTURING COMPANY SHALL NOT BE RESPONSIBLE FOR DAMAGE TO PROPERTY BEYOND THE PURCHASE PRICE OF THIS PRODUCT; HOWEVER, SOME STATES DO NOT ALLOW THE INCLUSION OR LIMITATION OF INCIDENTAL OR CONSEQUENTIAL DAMAGES, SO THIS LIMITATION MAY NOT APPLY TO YOU.