

1022-5510

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 12, 2007

Gail Early Watson
IBC Manufacturing Company
416 Brooks Road
Memphis, TN 38109

Subject: Product Name: DCD Copper Complex
EPA Reg. Number: 1022-551
Application Date: 19-Sep-2007
EPA Receipt Date: 21-Sep-2007

Dear Mrs. Watson:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with following comments.

Proposed Amendment:

- Add single-treatment pressure treating process
- Update first aid statements
- Update warranty statement.

Labeling Comments:

1. Add the following Personal Protection Equipment (PPE) language to the label:

Remove the Personal Protection Equipment (PPE) language from the precautionary statement and list it on the label as follows:

Personal Protective Equipment

Applicators and other handlers must wear:

- Long sleeved shirt and long pants,
- Socks and shoes
- Chemical-resistant gloves (such as: Barrier Laminate or any of the following gloves at 14 mils thickness: butyl nitrile, neoprene rubber, polyvinyl chloride or Viton).
- Goggles or face shield.

2. Add the following User Safety Requirements and Recommendations:

Follow manufacturer instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.@

"User Safety Recommendations"

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. User should remove personnel protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible wash thoroughly.

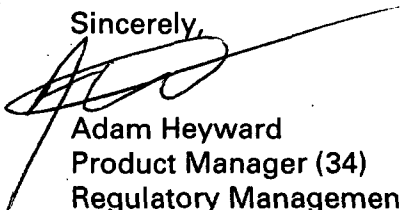
3. Add the following statement in bold letters to the front panel of the label, immediately following the product primary brand name:

"FOR PRESSURE WOOD TREATMENT ONLY."

Submit three (3) copies of the final printed label bearing the above revisions. A stamped copy of the label is enclosed for your record.

If you have any questions concerning this letter, please contact me by telephone at 703) 308-6422 or by e-mail at heyward.adam@epamail.epa.gov during the hours of 7:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Adam Heyward
Product Manager (34)
Regulatory Management II
Antimicrobials Division (7510P)

Enclosure: Stamped labeling

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DCD COPPER COMPLEX

Active Ingredient:
 Copper Hydroxide..... 15.4%
Inert Ingredients:..... 84.6%
***Total:**..... 100.0%

*Equivalent 10% metallic copper
 Pounds per gallon @ 68°F = 9.66

EPA Reg. No. 1022-551

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

DANGER (SKULL & CROSSBONES) POISON

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage and skin burns. Fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear goggles or face shield; protective clothing, and rubber gloves. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

See side panel for additional precautionary statements.

ACCEPTED
with COMMENTS
 EPA Letter Dated:
 DEC 12 2007

IBC Manufacturing Company
 416 East Brooks Road
 P.O. Box 9158
 Memphis, TN 38109-0158

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No. 1022-551

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DCD COPPER COMPLEX

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FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> ▪ 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 ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> ▪ Take off contaminated clothing. ▪ Rinse skin immediately with plenty of water for 15 – 20 minutes. ▪ Call a Poison Control Center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> ▪ 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. ▪ Do not give anything by mouth to an unconscious person.
IF INHALED:	<ul style="list-style-type: none"> ▪ 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.
HOT LINE NUMBER	
<p>In case of emergency, call Chemtrec toll free at 800-424-9300. Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p>	
<p>Note to physician: Probable mucosal damage may contraindicate use of gastric lavage.</p>	

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. 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 local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Do not store near heat or open flame.

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DCD COPPER COMPLEX

DIRECTIONS FOR USE

"FOR INDUSTRIAL USE ONLY"

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

PRESSURE TREATED WOOD

* Single Process:

This product should not be used in concentrated form. Do not attempt to use without the implementing the necessary safety procedures and equipment. For proper wood protection this product, (solubilized copper hydroxide) yields copper retentions ranging from about 0.05 to 0.20 lbs./cubic foot, which assures protection from many wood-destroying insects (including termites), decay fungi and mildew. Treated wood may typically be used for decks, buildings, fences, posts, poles, crossties, etc.

Dilute this product with water to concentrations ranging typically from 0.5 to 8 percent. Apply with a pressure process capable of achieving good sapwood penetration in appropriate pressure cylinders.

If desired, compatible fire retardants or water repellents may be added to the treating solution.

Applicators must wear goggles, gloves and protective clothing impervious to the wood treatment formulation in all situations where dermal contact is expected such as handling freshly treated wood and manually opening cylinder doors.

Dual Process:

This product may be used as the initial treatment in conjunction with sodium dimethyldithiocarbamate (SDDC) or sodium methylthiocarbamate, which are EPA-registered for this purpose. The use of the two separate pesticides fixes both in the wood (leaching is minimized), and they complement each other in protecting the wood, because the SDDC provides protection from copper-tolerant organisms.

This dual treatment, (copper hydroxide and SDDC) yields copper retentions ranging from about 0.05 to 0.20 lbs./cubic foot, assures protection from wood-destroying insects (including termites), decay fungi and mildew. Treated wood may typically be used for decks, buildings, fences, poles, etc.

Dilute this product with water to concentrations ranging typically from 0.5 to 8 percent. Apply with a pressure process capable of achieving good sapwood penetration in appropriate pressure cylinders.

If desired, compatible fire retardants or water repellents may be added to the treating solution.

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STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

STORAGE: Store in a secure, well-ventilated area protected from extreme temperatures. 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, 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 representative at your nearest EPA regional office for guidance.

CONTAINER DISPOSAL: 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.

GENERAL: Consult Federal, State, or local disposal authorities for approved alternative procedures.

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.