

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 1997

IBC Manufacturing Company
5966 Heisley Road
Mentor, OH 44060

Attention: Sangeeta V. Khattar
Registrations Representative

Subject: Chapco CU-NAP 800 EC Fungicide
EPA Registration Number 1022-568
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							

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CHAPCO CU-NAP 800 EC FUNGICIDE

WOOD PRESERVATIVE: END USE PRODUCT

FOR EXTERIOR USE ONLY

Ingredient Statement

Active Ingredient:	
Copper naphthenate.....	80.0%*
Inert Ingredients:	20.0%**
Total:	100.0%

- * Equivalent to 8% metallic copper
- ** Contains Petroleum Distillates

This product weighs 8.5 lbs/gallon

EPA Reg. No. 1022-568

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

WARNING

See Precautionary Statements.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 15 1997

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

1022-568

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals**WARNING**

Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Contaminated clothing should be removed and washed thoroughly before reusing. Use in a well-ventilated area.

Do not breathe vapors or mist during brush, roll, spray, 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 the 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.

FIRST AID**Statement of Practical Treatment**

IF IN EYES: Immediately flush with large quantity of water and get medical attention.

IF ON SKIN: Flush with water. Remove and wash contaminated clothing before re-use.

IF SWALLOWED: Do not induce vomiting. CALL A DOCTOR.

PHYSICAL AND CHEMICAL HAZARDS

Harmful if swallowed. Keep out of reach of children. Do not use, pour, spill, or store near heat or open flame.

ENVIRONMENTAL HAZARDS

This product 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 by cleaning of equipment or disposal of waste.

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.

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

Chapco Cu-Nap 800 EC must be diluted before use with water to protect treated items against deterioration by stain, mold and decay fungi, moss, mildew, termites, wood-boring beetles and carpenter ants.

Chapco Cu-Nap 800 EC 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. 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.

Chapco Cu-Nap 800 EC may be used by formulators as an active ingredient source for ready-to-use pesticide products registered with the U.S. Environmental Protection Agency.

Wood treated with Chapco Cu-Nap 800 EC should not be used where it may come in contact with food, feed or potable water.

FOR TEXTILE TREATMENT

Chapco Cu-Nap 800 EC solutions may be applied to cellulosic textiles and cordage products such as tents, awnings, tarpaulins, canvas products, ropes, and nets (except fishnets). However, Chapco Cu-Nap 800 EC should not be used to treat textiles intended for uses resulting in repeated skin contact or contact with food, feed or potable water. Effective application results in 1 percent 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 Chapco Cu-Nap 800 EC with water.

FOR TREATMENT BY DIP, ROLLER, BRUSH, AND SPRAYING**ABOVE GROUND CONTACT**

For above ground exposures, brush, spray, roller, or dip applications of solutions containing 1 or 2 percent copper metal are adequate for wood in non-critical applications. Dilute Chapco Cu Nap 800 with three volumes of water to obtain 2% copper metal or 7 volumes of water to obtain 1% copper metal.

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

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 AWPAs Standards* with a solution containing 0.5 to 1.0 percent by weight copper metal to a retention in the wood of 0.4 to 1.0 pounds copper metal per cubic foot is recommended.

GROUND CONTACT

For wood uses in ground contact, extended soaking or pressure treatment in accordance with AWPAs Standards* with a solution containing .75 to 1.0 percent by weight copper metal to a retention in the wood of .04 to 1.0 pounds copper metal per cubic foot is recommended.

*American Wood Preservers' Association, P.O. Box 286, Woodstock, MD
21663-0286 (410) 465-3168

FOR REMEDIAL TREATMENTS

Chapco Cu-Nap 800 EC solutions of 2% copper as metal may be used for internal or external remedial treatment of standing wood poles, piling and other existing structures.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Pesticide, spray mixture or rinsate that cannot be used or chemically reprocessed should be disposed of according to procedures approved by Federal, State, or local authorities.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling and 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 STATEMENT AND DISCLAIMER

Proper application is critical to the effectiveness of this product; however, when applied and used according to this label, this product is capable of protecting wood for uses described. The actual life of the treatment will be affected by the condition of the wood when treated, the species of wood, the type of exposure, and the previous and subsequent treatments.

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.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product, weather conditions, moisture conditions or other environmental conditions, and those conditions which are outside of the ranges that are generally recognized as being conducive to good application practice.

File: Special Review - CuNap Labels/Cu Nap 800

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.