

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 400
EPA Registration Number 1022-571
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".

- 2. The net contents should be declared on the label or on the container.

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.

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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CHAPCO CU-NAP 400 FUNGICIDE
End Use Product

WOOD PRESERVATIVE
FOR EXTERIOR USE ONLY

Ingredient Statement

Active Ingredient:	
Copper naphthenate.....	40.0%*
Inert Ingredients:	60.0%
Total:	100.00%

*Equivalent to 4% metallic copper

EPA Reg. No. 1022-571

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.

1022-571

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

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 400 is a concentrate and requires dilution with water or oil before use. To treat wood for use in moderate decay hazard locations, dilute one volume of Chapco Cu-Nap 400 with three volumes of water. To treat wood for use in high decay hazard locations, such as ground contact, dilute one volume of Chapco Cu-Nap 400 with one volume of water.

To treat wood to meet AWWPA requirements, mix one volume Chapco Cu-Nap 400 with from two to six volumes of fuel oil. Adjust the copper content of the treating solution by adding Chapco Cu-Nap 400 or fuel oil, in order to achieve the desired copper retention.

FOR TREATMENT BY DIP, ROLLER, AND BRUSH, AND SPRAYING

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

ABOVE GROUND CONTACT

The best results will be obtained if wood to be treated is immersed for three minutes or longer. If dipping is not possible, two ~~heavy~~ coats by brush, roller, or spray applications should be applied. Allow at least one hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to painting.

GROUND CONTACT

Seasoned or green wood may be treated. Make certain the wood is free of bark, then immerse in Chapco Cu-Nap 400 for 12-48 hours or until the sapwood is completely penetrated.

Water repellents may be admixed with Chapco Cu-Nap 400 to improve dimensional stability of the treated wood. Colorants may be admixed for aesthetics and additional uv protection. This product is compatible and may be colored by the universal machine colorants employed to color oil or water based paints. Note that colorants weather differently, and that color development varies with species, grain and wood undertone.

RECOMMENDED FOR

Porches, siding, shingles, trellises, steps, ~~sub-flooring, furniture, fence pickets, and rails, furring strips, arbors, and flooring.~~ Powder post beetles which invade ~~furniture, flooring and structural~~ lumber are killed by application of this preservative. These insects will not attack the treated wood. ~~Wood rot protection of interior use wood is only needed on wood which is subject to frequent or prolonged wetting (e.g., condensation, rain see page).~~

Chapco Cu-Nap 400 may also be used on fence posts, poles, foundation sills, decks, boats and all exterior wood exposed to moisture or weather. Pretreatment only. Do Not apply on or near water or wetlands.

Since Chapco Cu-Nap 400 has very low phytotoxicity it can be used to treat wood for greenhouses, nursery flats, etc.

In addition to preventing decay, blue stain, and insect attack on wood, Chapco Cu-Nap 400 controls warping, swelling, shrinking and end checking caused by changes in moisture content of lumber and plywood products.

Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood treated with Chapco Cu-Nap 400 wood preservative.

Wood treated with Chapco Cu-Nap 400 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. 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/Chapco Cu Nap 400

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.