100 cm 1994

Sangeeta V. Khattar IBC Mfg. Co. 416 East Brooks Road P.O. Box 9158 Memphis, TN 38109

Dear Ms. Khattar:

Subject: Revised Labeling

DCD Copper Sulfate

EPA Registration No. 1022-573

Your Submission Dated March 28, 1994

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Since this product is in Toxicity Category I DANGER, the Statements of Practical Treatment must be on the front panel.
 - b. We note that in the warranty "IBM Manufacturing Company" appears to be a typographical error. Proof read the label.
 - c. The directions for use under <u>Pressure Treated Wood</u> could be confusing. Modify the fist sentence so it reads as follows:

This product should only be used in conjunction with sodium dimethyldithiocarbamate (SDDC) or sodium methyl dithiocarbamate which are EPA registered for this purpose.

Modify the second paragraph in this section so it reads similar to the following:

This dual treatment, for example this product with "Buffalo System II" (40% SDDC), at copper retention ranging from 0.05 to 0.20 lbs/cubic food, assures protection from wood destroying insects (including termites), decay fungi, and mildew.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Cynthia Giles-Parker Product Manger (22) Fungicide Herbicide Branch Registration Division (7505C)

Enclosure

Active Ingredient:
Copper Sulfate Pentahydrate

99.0% 1.0%

Inert Ingredients:

Total:

100.0%

(Metallic Copper Equivalent 25.2%)

EPA Reg. No. 1022-573

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

See Precautionary Statements.

ACCEPTED **IN COMMERCIAL** in BPA Lotter Drend:

APR 29 1994

Under the Federal Investigate Complete and Reducine Act is attenuated, for the prestitute rightend water RPA tops from

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

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER - PELIGRO

Causes severe eye and skin irritation. Harmful if absorbed through the skin or inhaled. May cause skin sensitization reactions in certain individuals. Avoid contact with the skin, eyes, or clothing. Avoid breathing dust. Protective clothing, including goggles should be worn. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. PRECAUTION AL USUARIO: Si usted no les ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente.

FIRST AID Statement of Practical Treatment

If in eyes: Flush with plenty of water. Call a physician.

If on skin: Wash with plenty of soap and water. Cet medical attention.

If swallowed: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol.

Note to physician: Probable mucosal damage may contraindicate use of gastric lavage.

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.

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DIRECTIONS FOR USE

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

PRESSURE TREATED WOOD

This product should only be used in conjunction with sodium methyldithiocarbamate or sodium methyl dithiocarbamate which are EPA registered for this purpose. The use of the two products fixes both in the wood (leaching is minimized), and they complement each other in protecting the wood, because the dithiocarbamate provides protection from copper tolerant organisms

This-product, when used with Buffalo System II in dual pressure treatments yielding copper retentions of 0.05 to 0.20 pounds per cubic foot of wood, protects against wood destroying insects (including termites), decay fungi, and mildew. Treated wood may be typically used for decks, buildings, fences, poles, etc.

Dilute this product with water to concentrations ranging typically from 1 to 4 percent. Apply with a pressure process capable of achieving 95% 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

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. Store in a cool, dry place.

CONTAINER DISPOSAL: Completely empty bag into application equipment and dispose of in a sanitary landfill, by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND LIMITATION OF DAMAGES

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 as described above. 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 previous and subsequent treatments.

READ THE LABEL TF DROUGHLY BEFORE USE AND COMPLY WITH ALL DIRECTIONS, AND USE COMMON SENSE IN 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. IBM 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.

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