Pm 22

APR 29 1994

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

Dear Ms. Khattar:

Subject: Revised Labeling Buffalo System II EPA Registration No. 1022-577 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. We note that in the warranty "IBM Manufacturing Company" appears to be a typographical error. Proof read the label.

b. The directions for use under <u>Pressure Treated Wood</u> could be confusing. Modify the last sentance so it reads similar to the following:

Buffalo System II treatments should be done only in conjunction with dual treatments with either DCD Complex or DCD Copper Sulfate.

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,

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131

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

Enclosure

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Active Ingredient: Sodium Dimethyldithiocarbamate Inert Ingredients:	40.0% 60.0%
Total:	100.0%
EPA Reg. No. 1022-577	EPA Est. No. 1022-TN-1
KEEP OUT OF REACH OF CHILDREN	AQUERTED with COMBRENTS In 2814 Lower Dural
WARNING	APR 29 1994
See Precautionary Statements.	Control and the second and the second and the second the second the second the second the second and the second
IBC Manufacturing Co 416 East Brooks Ro P.O. Box 9158 Memphis, TN 38109- Phone: 901/344-5300 - Fax: 9	ad . 0158

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#### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

#### WARNING

Causes eye and skin irritation. Do not get in eyes, on skin or on clothing. Wear goggles or face shield, rubber gloves and protective clothing (hats, long-sleeved shirt, long pants and boots) when handling. Harmful or fatal if swallowed. Avoid contamination of food and feedstuffs.

#### FIRST AID

## Statement of Practical Treatment

In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes. For eyes, call a physician. Remove and wash contaminated clothing before reuse.

If swallowed: Drink promptly a large quantity of egg whites, gelatin solution, or if these are not available, drink large quantities of water. Call a physician immediately.

#### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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.

596

## DIRECTIONS FOR USE

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

#### PRESSURE TREATING WOOD

BUFFALO SYSTEM II, when used in conjunction with either DCD Complex or DCD Copper Sulfate in dual pressure treatments yielding copper retentions of 0.05 to 0.20 pounds per cubic foot of wood, will prevent attack from wood destroying insects (including termites), decay fungi and mildew. Treated wood may typically be used for decks, buildings, fences, poles, etc.

BUFFALO SYSTEM II is used with a pressure procedure to treat sapwood to achieve retention levels of 0.24 to 0.96 lbs. per cu. ft. of copper (bis) dimethyldithiocarbamate (CuDDC).

BUFFALO SYSTEM II should be diluted with water as needed to achieve the correct concentration for sapwood penetration and retention.

If desired, compatible fire retardant salts can be added to the treating solution to produce fire retardant wood.

Maintain a pH of at least 9.0 during all phases of treatment. Do not allow the solution pH to drop below 7.0 because undesirable decomposition products may develop.

Do not enter treatment cylinder after treatment until cylinder has been purged with air. Alternatively, a face mask with separate air supply may be used.

BUFFALO SYSTEM II treatments should be done only in conjunction with separate treatments with EPA-approved, copper-based wood preservatives registered by IBC Manufacturing Company.

6

#### STORAGE AND DISPOSAL

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

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. 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 the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Reseal container and offer for reconditioning, or

Metal Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill or by other approved state and local procedures.

**Plastic Containers:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incinerator, or, if allowed by state and local authorities by burning. If burned stay our of smoke.

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

## 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 THOROUGHLY 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 MAY NOT INCIDENTAL OR CONSEQUENTIAL DAMAGES, SO THIS LIMITATION MAY NOT APPLY TO YOU.

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For Chemical Emergency Spill, Leak, Fire, Exposure, or Accident Call CHEMTREC - Day or Night 1-800-424-9300

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