

1022-579

11-24-2003

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

November 24, 2003

Gail Early  
Registrations Representative  
IBC Manufacturing Company  
416 E. Brooks Road  
Memphis, TN 38109

Subject: CuRap 20 Pak  
EPA Registration No. 1022-579  
Application Date: October 16, 2003  
EPA Received Date: October 17, 2003

Dear Ms. Early:

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

**Proposed Amendment**

- Update First Aid Statements per PR Notice 2001-1
- Update Precautionary Statements
- Update Environmental Hazard Statements
- Update Warranty Statement

**Conditions**

Revise the label as follows:

1. Revise the "If Swallowed" section of the First Aid Statements to include the statement "Do not give anything to an unconscious person."

CONCURRENCES							
SYMBOL	7500						
SURNAME	Sehay						
DATE	11-24-03						

**General Comments**

A stamped copy of the labeling accepted with conditions is enclosed. Submit three(3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



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

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Net Contents:

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

NOV 24 2003

### CuRAP® 20 PAK

### WOOD PRESERVATIVE PASTE

### FOR EXTERIOR USE ONLY

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 1022-579

### EFFECTIVE GROUNDLINE TREATMENT FOR CONTROL OF DECAY AND INSECTS

### FOR COMMERCIAL APPLICATOR USE ONLY

#### Ingredient Statement

**Active Ingredients:**

Copper naphthenate.....	18.16% *
Borax (sodium tetraborate decahydrate).....	40.00%

<b>Inert Ingredients:</b> .....	41.84%
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<b>Total:</b> .....	100.00%
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\*Equivalent to 2% metallic copper.  
U.S. Patented.

EPA Reg. No. 1022-579

EPA Est. No. 1022-TN-1

## KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID	
<b>IF SWALLOWED:</b>	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.
<b>IF ON SKIN OR CLOTHING:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call Poison Control Center or doctor for treatment advice.
<b>IF IN EYES:</b>	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.
<b>IF INHALED:</b>	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.
IN CASE OF EMERGENCY, CALL CHEMTREC AT 800-424-9300.	
Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.	
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate use of gastric lavage.	

Manufactured by:  
IBC Manufacturing Company  
416 East Brooks Road  
Memphis, TN 38109

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## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER

Corrosive. Causes irreversible eye damage or skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

#### Personal Protective Equipment (PPE):

Applicators must wear gloves impervious to the wood treatment formulation (e.g., polyvinyl chloride (PVC) or neoprene) in all situations where dermal contact is expected (e.g., during the actual application process and when handling freshly treated wood).

Applicators should wear long sleeved shirts, long pants, and an impermeable apron during the application process and all situations where dermal contact is expected. Remove contaminated clothing and wash before reuse. Launder work clothing separately from other household clothing. Dispose of worn-out work clothing and work shoes or boots in any general landfill, in the trash, or in any other manner approved for pesticide disposal.

#### Handlers must wear:

- Goggles or face shield
- Coveralls worn over long-sleeved shirt and long pants
- Chemical resistant gloves (such as Barrier Laminate, Butyl Rubber, Neoprene Rubber, Nitrile Rubber) shoes plus socks.
- Dust-mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any N, R, P or HE prefilter.

Do not breathe vapor or mist during brush, roll, spray, or 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 this product.

#### User safety recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- User should remove clothing immediately if pesticide gets inside.
- Then wash thoroughly and put on clean clothing.

In case of medical questions, emergencies or accidents involving this product, call Chemtrec at 1-800-424-9300.

### ENVIRONMENTAL HAZARDS

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.

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**PHYSICAL AND CHEMICAL HAZARDS**

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Do not use or store near heat or open flame.

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**DIRECTIONS FOR USE**

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

**The CuRap 20 Pak ("Pak") is a premanufactured bandage and is intended for use as a primary or remedial treatment for standing wood utility poles and as a primary or remedial treatment for wooden structures standing in the ground that are susceptible to attack by decay and soft rot fungi, termites, carpenter ants, or wood boring beetles.**

For utility poles, pilings, posts, and other wooden structures standing in the ground, excavate the soil away from the structure to a depth of about 18 inches. Wire brush or scrape the surface to remove adhering soil and remove any damaged wood. The structure should be inspected for internal decay and insect attack by taking increment borings. If internal damage is found, early replacement or stubbing is recommended. Plug bore holes with locust plugs or treated wood plugs.

**CuRap 20 Pak(s)** may be used to cover groundline areas of structures in bands typically 18 to 22 inches in height. **CuRap 20 Pak(s)** should be applied to at least cover the wood surface 4 inches below the last evidence of decay and 3 inches above the groundline. Wrap top with 3" black reinforced tape allowing tape to overlap and staple into place. More than one **Pak** may be used in special cases where the structure spans a height greater than 22 inches, such as on hillsides or the circumference of the structures exceeds the bandage length. Overlap ends of the **Pak** to insure complete coverage of pole with preservative paste. Wrap the **Pak** tightly, stapling or nailing it in place. Back-fill and tamp dirt firmly, mounding within 1-inch of bandage top. Do not back-fill above top edge of **Pak**.

**Wood treated with the CuRap 20 Pak should not be used where it may come in contact with food, feed or potable water.**

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**STORAGE AND DISPOSAL**

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**PROHIBITIONS:** Do not contaminate water, food, or feed by storage or disposal.

**STORAGE:** Store away from food or feed in a secure, well-ventilated area protected from extreme temperatures. Do not allow to freeze. 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 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:** Plastic and paper CuRap 20 Pak packaging materials may be used as wraps to cover around the poles. Otherwise, dispose of these materials in a sanitary landfill or by incineration if allowed by State and local authorities.

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## **WARRANTY AND LIMITATION OF DAMAGES**

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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.

CuRap® is a registered trademark of ISK Americas Incorporated.

