



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

JUL 21 2011

Ms. Gail Watson
IBC Manufacturing Company
416 East Brooks Rd.
Memphis, TN 38109

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: Technical Tuffgard
EPA Registration No.: 1022-582
Notification Date: 07/07/2011
EPA Receipt Date: 07/13/2011

Dear Ms. Watson,

This letter acknowledges receipt of your notification submitted under the provision of FIFRA section 3(c)9 and PR Notice 98-10.

Proposed Notification

- Update of Container Disposal statements as per PR Notice 2007-4

General Comments

Based on a review of the submitted materials, your notification for the update of the Container Disposal statements as per PR Notice 2007-4 is acceptable and has been made a part of the records on file.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at carl.jaclyn@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Campbell-McFarlane".

Jacqueline Campbell-McFarlane
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-582	2. EPA Product Manager Campbell-McFarlane	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Technical Tuffgard	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 East Brooks Road Memphis, TN 38109 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
 Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR SS 156.10, 156.140, 156.144, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements of 0 CFR SS 156.10, 156.140, 156.144, 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container	<input checked="" type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 55 lb - 1102 lb/500 kg		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Gail Watson	Title Registrations Representative	Telephone No. (Include Area Code) C C C C C C C C C C
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) C C C C C C C C C C
2. Signature <i>Gail Watson</i>	3. Title Registrations Representative	
4. Typed Name Gail Watson	5. Date July 11, 2011	

Batch No.

Net Contents:

Company Logo

TECHNICAL TUFFGARD™

For Formulating Wood Treatment Fungicides for Lumber, Timber and Wood Composites

For Manufacturing Use to Impart Mildew Control on Paint and Stain Films, Adhesives, Caulks and Sealants

Active Ingredient:	By Wt
Chlorothalonil (tetrachloroisophthalonitrile).....	97.0%
Inert Ingredients:	3.0%
Total:	100.0%

Keep Out of Reach of Children

DANGER

See side panel for additional precautionary statements.

ISK Biocides, Inc.
416 East Brooks Road
Memphis, TN 38109

EPA Reg. No. 1022-582
EPA Est. No. 1022-TN-1

NOTIFICATION
Date Reviewed: 2/21/14
Reviewed By: J. Cal

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive, causes irreversible eye damage and skin burns. **Do not** get in eyes, on skin, or on clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wear goggles or face shield, rubber gloves, long-sleeve shirt, and long pants when handling this product. Wash thoroughly with soap and water after handling this product. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. May be fatal if inhaled. **Do not** breathe dust. Harmful if swallowed or absorbed through the skin.

NOTE TO USER: This product may produce mild bronchial irritation and temporary irritation of the skin characterized by redness or rash on exposed skin areas. Affected persons should consult a physician.

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> ▪ 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.
IF INHALED:	<ul style="list-style-type: none"> ▪ Remove 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.
IF SWALLOWED:	<ul style="list-style-type: none"> ▪ 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. ▪ Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> ▪ Take off contaminated clothing. ▪ Rinse skin immediately with plenty of water for 15 – 20 minutes. ▪ Call a Poison Control Center or doctor for further treatment advice.
HOT LINE NUMBER	
In case of emergency, call Chemtrec toll free at 800-424-9300. Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<p>NOTE TO PHYSICIAN: Persons having temporary irritation may respond to treatment with antihistamines or steroid creams and/or systemic steroids. Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

ENVIRONMENTAL HAZARDS:

This product is toxic to fish and wildlife.

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 Environmental Protection Agency.

DIRECTIONS FOR USE

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

FOR FORMULATION PURPOSES ONLY

For formulation into a fungicide for Wood Protection Treatments, including lumber and timber (green or seasoned), and wood composites.
For manufacturing use to impart mildew control on paint and stain films, adhesives, caulks and sealants.

Do not apply this product in a way that will contact workers or others. Only protected handlers may be in the area during use.

PAINT & STAIN FILMS, ADHESIVES, CAULKS AND SEALANTS:

This product must not be formulated into a product intended as a mildewcidal paint additive designed for direct sale to retail customers, e.g. in a "pillow pack" or other small volume or one-use package.

This product may only be formulated into mildewcidal paint additive products that are labeled as follows: "This product may only be added to paint products that are labeled A) with product-specific instructions for the use of a respirator during application, or B) as follows, "When applying with a sprayer, wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P, or HE filter. If oil is not present in the paint product or recommended for use as an additive in the paint product, add "n" as an additional respirator type".

This product must not be used to formulate products for use as in-container preservatives.

Technical Tuffgard, a micromilled powder, is best dispersed during the pigment grinding operations for paints, stains and coatings. Grinding equipment normally used in the paint industry is recommended.

LATEX EMULSION PAINTS, STAINS AND COATINGS:

Disperse 5 to 10 pounds of Technical Tuffgard per 100 gallons of exterior paint to obtain effective mildew control in the paint film after it is applied. Use the high rate in areas favorable to mildew and mold growth, such as where painted surfaces frequently are warm and moist. Technical Tuffgard, when added to stains designed

for exterior wood, also protects the wood from surface molds and mildew stains caused by fungi.

Use 2.5 to 5 pounds of Technical Tuffgard per 100 gallons of interior latex paint. Technical Tuffgard is compatible with zinc oxide in latex paints. Technical Tuffgard can be used with either unmodified or alkyd modified acrylic, vinyl acrylic, or polyvinyl acetate latexes.

Technical Tuffgard can be added into the paint formula during the pigment grind operation, during or after letdown, or post-added to a finished paint product after manufacture.

Note: If Technical Tuffgard is used to produce post-manufacturing paint additive products, such products must be distributed to and used by only professional personnel engaged in the mixing or blending of paints. Such post-manufacturing paint additive products may not be sold directly to homeowners or non-professional painters.

If an in-can preservative is used in combination with Technical Tuffgard, its compatibility with Technical Tuffgard should be examined first.

DO NOT use in paints designed for applications on food-contact surfaces, or on the interior of buildings engaged in food processing or food handling. DO NOT used in paints designed to be handled by children.

SOLVENT BASED EXTERIOR PAINTS, STAINS AND COATINGS:

Technical Tuffgard protects solvent-based paint and stain films from mold growth on the coated surface. Disperse 5 to 12 pounds of Technical Tuffgard per 100 gallons of paint. Use the high rate in areas favorable to mildew and mold growth, such as where painted surfaces frequently are warm and moist. Technical Tuffgard, when added to stains designed for exterior wood, also protects the wood from surface molds and mildew stains caused by fungi.

Dispersion is readily accomplished during the pigment grinding operation. Zinc oxide can be used with Technical Tuffgard.

ADHESIVES:

Technical Tuffgard may be incorporated into adhesives to protect the applied adhesive films from mold growth and decomposition. Fully disperse 5 to 10 pounds of Technical Tuffgard per 1,000 pounds of adhesive while it s being manufactured. Use the high rate in areas favorable to mildew and mold growth, such as where surfaces frequently are warm and moist.

DO NOT use in adhesives designed for applications on food-contact surfaces, on the interior of buildings engaged in food processing or food handling.

CAULKS AND SEALANTS:

To provide mildew and mold control on caulking or sealing deposits after application, fully disperse 0.5 to 5 pounds of Technical Tuffgard per 1,000 pounds of caulk or sealant products while they are being manufactured. The high rate is recommended for exterior caulks.

DO NOT use in caulks or sealants designed for applications on food-contact surfaces, or on the interior of buildings engaged in food processing or food handling.

GROUTS:

Technical Tuffgard may be incorporated into tile grouts to protect the finished grout joints from mold growth. Add Technical Tuffgard to dry grout at 0.4 to 1.6% by weight during the dry blending process (0.4 to 1.6 pounds of Technical Tuffgard per 100 pounds of dry grout blend). Adequate controls should be employed to prevent dusting during the handling and use of this product.

WOOD TREATMENT:

TECHNICAL TUFFGARD is an excellent protective fungicide for control of a broad spectrum of fungal organisms, such as molds and decay fungi, which deface and rot lumber. **Technical Tuffgard** is effective when applied as a protective fungicide against the following surface fungi: *Trichoderma viride*, *Trichoderma harzianum*, *Penicillium expansum*, *Penicillium decumbens*, *Aspergillus flavus*, *Aspergillus niger*, *Auriobasidium pullulans*, *Ceratocystis pilifera*, *Diplodia gossypina*, and *Gliocladium deliquescens*. **Technical Tuffgard** is effective when applied as a protective fungicide against the following wood decaying fungi: *Coniophora puteana* (syn. *Coniophora cerebella*), *Gloeophyllum trabeum* (syn. *Lenzites trabea*), *Irpex lacteus* (syn. *Polyporus tulipiferae*), *Lentinus lepideus*, *Merulius lacrymans* (syn. *Serpula lacrymans*), *Pleurotus ostreatus*, *Poria incrassata*, *Postia placenta* (syn. *Poria monticola*, *Poria placenta*), *Trametes versicolor* (syn. *Coriolus versicolor*, *Polyporus versicolor*).

Information on the composition, methods of use, applicable restrictions or limitations, and effectiveness of this product for pesticide purposes may be obtained from ISK Biocides, Inc.. Determination of efficacy of any formulation prepared with **Technical Tuffgard** is the responsibility of the formulator. Labeling of pesticide formulations made from this product must conform to Federal label requirements for end-use chlorothalonil products. Each formulator is responsible for obtaining EPA registration for his end-use product.

COMPOSITE WOOD PRODUCTS:

To provide decay protection for composite wood products, such as flakeboard or particleboard that is to be used for building siding, sheathing, construction timbers, decking or planking, incorporate Technical Tuffgard into the wood composite material while it is being manufactured. Use 0.5 to 5 pounds of Technical Tuffgard per cubic foot volume of final wood composite. The high loading rate should be used

in composite wood products that are intended to be installed in contact with soil or concrete, or where the wood is intended to be exposed to conditions with continuously high levels of moisture. Thoroughly incorporate Technical Tuffgard into the composite material as it is being ground, mixed, or blended with adhesives or binding materials prior to final formation of the wood composite matrix.

STORAGE AND DISPOSAL

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

STORAGE: This product must be stored in a cool place. Protect from excessive heat.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, pesticide spray 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 HANDLING:** Non-refillable container. Do not reuse or refill this container. Clean container promptly after emptying. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities.

**WARRANTY AND
LIMITATION OF DAMAGES**

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

