

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

August 23, 2006

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

Subject: Tuff-Brite
EPA Registration No.: 1022-584
Application Date: June 23, 2006
Receipt Date: June 27, 2006

Dear Mr. Culleen,

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

Proposed Notification

- Changes in accordance with past EPA communications, specifically letters dated April 5, 2005 and October 13, 2005.

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

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 (7510P)

CONCURRENCES

SYMBOL	7510P						
JRNAME	Gahr						
DATE	8/22						

IBC MANUFACTURING COMPANY

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June 23, 2006

Mr. Marshall Swindell, PM 33
Regulatory Management Branch I
Antimicrobials Division (7510C)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: Tuff-Brite (1022-584) - Response to Agency Letters Dated Mar 31, 2004,
Apr 5, 2005, and Oct 13, 2005 (Copies Attached)

Dear Mr. Swindell:

On October 13, 2005, the Agency sent a letter requesting changes to our Tuff Brite label as a result of the Reregistration of Chlorothalonil. Another Agency letter dated April 5, 2005, also issued as a result of the Reregistration, asked for some specific language for the paint and coatings use.

In preparing this submission, I realized that the label approved on 10/13/05 did not include the uses and changes approved 3/31/04. Those changes included the addition of use in wood composites; use for mildew control in paint and stain films, etc.; and addition of recommendation to constantly agitate.

The purpose of this submission is to incorporate the changes requested in all three Agency letters into one label for stamping approved.

Enclosed are three copies of the proposed labels for your review and approval.

If you have questions or need additional information, I can be reached at 901-344-5316 or earlyg@ibio.com.

Sincerely,



Gail Early
Registrations Representative

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Enclosures

Net Contents:

TUFF-BRITE®

**For Control of Sapstain and Mold in
Freshly Cut Lumber and Timbers and
Decay Protection in Wood Composites**

**To Impart Mildew Control on Paint and Stain Films,
Adhesives, Caulks and Sealants**

FOR INDUSTRIAL USE ONLY

Read Entire Label Carefully and Use Only as Directed

Ingredient Statement

Active Ingredient:

Chlorothalonil (tetrachloroisophthalonitrile). 40.4%

Inert Ingredients: 59.6%

Total: 100.0%

Patent Pending

EPA Reg. No. 1022-584

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109
901-344-5350

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS**WARNING**

May be fatal if inhaled. Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Do not breathe spray mist. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

Personal Protective Equipment

Mixers, loaders, applicators and all other handlers must wear:

- long sleeve shirt and long pants
- shoes plus socks
- chemical resistant gloves (such as or made out of any waterproof material)
- when spraying, wear a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH-approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

Follow manufacturer's instructions for cleaning / maintaining Personal Protective Equipment (PPE). If no such instructions or washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Do not apply this product in such a manner as to directly, or through drift, expose workers or other persons.

User Safety Recommendations:

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

First Aid:

IF IN EYES: In case of contact with eyes, immediately flush eyes with plenty of water and continue for 15 minutes. Seek medical attention for eyes immediately.

IF INHALED: 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.

IF SWALLOWED: 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 to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN: Wash exposed areas of skin with soap and warm water after handling or using.

NOTE TO PHYSICIAN: Persons having a temporary allergic reaction respond to treatment with antihistamine or steroid creams and/or systemic steroids.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic vertebrates, aquatic invertebrates, marine/estuarine organisms and wildlife.

Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

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.

APPLY ONLY AS SPECIFIED ON THIS LABEL

GENERAL PRECAUTIONS AND RESTRICTIONS

- **KEEP OUT OF REACH OF CHILDREN**
- **Do Not Store near Foodstuffs**
- **This Product is Toxic to Fish**
- **Furnish Protective Clothing and Goggles to Workers**
- **Instruct Workers to Use Good Hygiene And Always Wash Hands Before Eating or Drinking.**
- **Do not apply this product in a way that will contact workers or other persons, or pets, either directly or through drift. Only protected handlers may be in the area during application.**
- **Do not allow others to enter the treatment area until sprays have settled.**

WOOD PROTECTION:

General: TUFF-BRITE® is a liquid formulation to be dispersed in water for control of sapstain and mold in freshly sawed lumber and timbers and decay protection in wood composites. The dispersion in water may be applied by dip or a coarse spray. Shake or mix the concentrate well before dispersing in the water.

Constant (24-hour) agitation is required in the dip vat, pre-mix tank, or nurse tank to maintain adequate distribution of the treatment material. Agitation should continue even when no treatment operation is occurring, such as overnight and on weekends.

Lumber Treatment: For lumber approximately 2" (50 mm) or less in thickness, use 1 quart (a liter) per 100 gallons (378 liters) of water. Dip or spray the lumber until all surfaces are thoroughly wet.

Timber Treatment: For timbers or lumber thicker than 2" (50 mm), use 2 quarts (2 liters) per 100 gallons (378 liters) of water. Measure the chemical and water accurately. Dip or spray until all surfaces are thoroughly wet.

Seasoned Wood Treatment: For control of mildew fungi on seasoned wood above ground, mix 1 to 2 1/2 gallons of TUFF-BRITE with 100 gallons of water, water repellent, or latex coating, and apply by brush or spray.

Proper Handling of Treated Lumber and Timbers: For best results, use fresh logs as free from infection as possible before converting into lumber. Treat the lumber as soon as possible (within 12 to 24 hours) after cutting. Place lumber and timbers on sticks if possible for rapid air seasoning. Protect freshly treated lumber from excessive rainfall immediately after treatment.

Note #1: If possible, dipping is better than spraying for complete coverage of all surfaces.

Note #2: Bulk piled lumber and timbers should always use the stronger mixture.

Composite Wood Products:

To provide decay protection for composite wood products, such as flakeboard or particle board that is to be used for building siding, sheathing, construction timbers, decking or planking, incorporate Tuff-Brite into the wood composite material while it is being manufactured. Use 1.25 to 12.5 pounds of Tuff-Brite 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 Tuff-Brite 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.

For Pressure Treatments:

APPLY WITH CCA PRESSURE TREATMENT: Add 0.2 – 0.4 gallons of Tuff-Brite to 100 gallons of CCA treating solution ready to use. Pressure treat wood or lumber by the standard procedure of American Wood Preservers' Association.

APPLY BEFORE PRESSURE TREATMENT: Dip wood in a vat containing 0.2 - 0.4 gallons of Tuff Brite to 100 gallons water. This is to control mold while wood is air drying. CCA pressure treating may be done immediately following the dip treatment if desired.

APPLY AFTER CCA PRESSURE TREATMENT: Dip CCA-treated wood in a vat containing 0.2 – 0.4 gallons of Tuff Brite to 100 gallons of water. This may be done as soon after pressure treatment as desired.

PAINT & STAIN FILMS, ADHESIVES, CAULKS AND SEALANTS:

This product is used to protect treated articles from decay, mold or mildew, including paints and stains, adhesives, caulks, grouts 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 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, use a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH-approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P OR HE prefilter. (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 as an in-container preservative.

Mix contents slowly before using to assure uniform mixture. Tuff-Brite is an aqueous dispersion containing 40.4% (wt/wt) active ingredient. Tuff-Brite is to be used in water-based or water-compatible products only.

Latex Emulsion Paints, Stains and Coatings:

Disperse 12.4 to 24.8 pounds (9.6 to 19.3 pints) of Tuff-Brite 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. Tuff-Brite, when added to stains designed for exterior wood, also protects the wood from surface molds and mildew stains caused by fungi.

Use 6.2 to 12.4 pounds (4.8 to 9.6 pints) of Tuff-Brite per 100 gallons of interior latex paint.

Tuff-Brite is compatible with zinc oxide in latex paints.

Tuff-Brite can be used with either unmodified or alkyd modified acrylic, vinyl acrylic, or polyvinyl acetate latexes.

Tuff-Brite 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 Tuff-Brite 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 such 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 Tuff-Brite, its compatibility with Tuff-Brite 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 use in paints designed to be handled by children.

Aqueous Adhesives

Tuff-Brite may be incorporated into adhesives to protect the applied adhesive films from mold growth and decomposition. Fully disperse 12.4 to 24.8 pounds of Tuff-Brite per 1,000 pounds of adhesive while it is 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, or on the interior of buildings engaged in food processing or food handling.

Aqueous Caulks and Sealants

To provide mildew and mold control on caulking or sealing deposits after application, fully disperse 1.25 to 12.5 pounds of Tuff-Brite 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.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool place. Protect from excessive heat.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 DISPOSAL: DO NOT reuse empty container. Triple rinse (or equivalent). The offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

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 the purchase price of the product as to which a claim is made.

Tuff-Brite

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Prepared & submitted in response Agency ltrs dated 10/13/05, 3/31/04 & 4/5/05.