

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 30, 2004

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

Subject: Premier
EPA Registration Number 1022-585
Application Date: November 4, 2004
EPA Received Date: November 9, 2004

Dear Ms. Early:

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

Proposed Notification

- Minor labeling revision

General Comments

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

The notification application is acceptable. 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 (7510 C)

CONCURRENCES

SYMBOL	7510C						
SURNAME	Heyward						
DATE	11-30-04						



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-585	2. EPA Product Manager Heyward	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Premier	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 _____	NOTIFICATION Date Reviewed: <u>12-17-04</u> Reviewed By: <u>[Signature]</u>
<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 updated Warranty Statement.
This notification is consistent with the provisions of PR Notice 95-2 and the requirements of EPA's regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S. C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and the requirements of 40 CFR 152.46, 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 type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes" Unit Packaging wgt. No. per container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
If "Yes" Package wgt. No. per container					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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 Early	Title Registrations Representative	Telephone No. (Include Area Code) 901-344-5316
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)
2. Signature <u>Gail Early</u>	3. Title Registrations Representative	
4. Typed Name Gail Early	5. Date <u>Nov. 4, 2004</u>	

IBC MANUFACTURING COMPANY

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November 4, 2004

Mr. Adam Heyward, Team Leader (34)
Regulatory Management Branch II
Antimicrobials Division (7510W)
U.S. Environmental Protection Agency
Crystal Mall #2
1801 South Bell Street
Arlington, VA 22202

NOTIFICATION
Date Reviewed: 11-17-04
Reviewed By: [Signature]

Re: Premier (EPA Reg. No. 1022-585)
Notification of Updated Warranty

Dear Mr. Heyward:

The purpose of this submission is to notify the Agency of an updated Warranty Statement for the above product.

This submission includes:

- Application Form
- One Copy of Proposed Label with Changes Marked

This notification is consistent with the provisions of PR Notice 95-2 and the requirements of EPA's regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S. C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and the requirements of 40 CFR 152.46, 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.

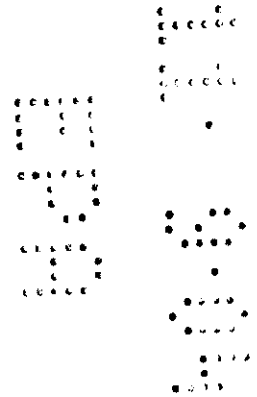
We are hopeful the Agency will find this notification acceptable and make it a part of the record for this product. If you have questions or need additional information, I can be reached at 901-344-5316 or earlyg@ibio.com.

Sincerely,

Gail Early

Gail Early
Registrations Representative

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TRANSMITTAL DOCUMENT

NOTIFICATION

(UPDATED WARRANTY STATEMENT)

PREMIER

(EPA Reg. No. 1022-585)

November 4, 2004

Company Official:

Gail Early
Name

Gail Early
Signature

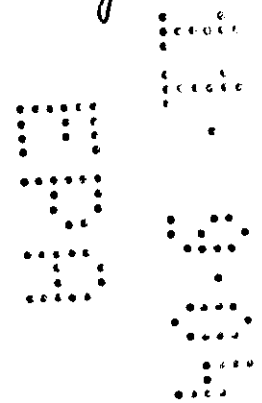
Company Name:

IBC Manufacturing Company
416 East Brooks Road
Memphis, TN 38109

Company Contact:

Gail Early
Name

901/344-5316
Phone



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PREMIER®

SAPSTAIN / MOLD CONTROL For Fresh Cut Lumber & Wood Products

NOTIFICATION
Date Reviewed: 11-17-04
Reviewed By: SGV

Effective on softwoods, including Douglas fir, white fir, spruce, hemlock and pines (including southern and western yellow pines & eastern and western white pines) and many hardwoods, including oak, poplar and maple.

INGREDIENT STATEMENT

ACTIVE INGREDIENTS:

3-Iodo-2-Propynyl Butyl Carbamate 6.0%

Propiconazole:1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl]-1H-1,2,4-triazole 3.0%

OTHER INGREDIENTS: 91.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements.

Manufactured for:

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

EPA Reg. No. 1022-585

EPA Est. No. 1022-TN-1

Net Contents: _____ Batch No.: _____

Printed in USA.

*Premier is a registered trademark of ISK Americas Incorporated.

DIRECTIONS FOR USE

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

Do not use water collected from treated wood for potable water.

Premier is a liquid concentrate of 3-Iodo-2-Propynyl Butyl Carbamate (IPBC) and 1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl]-1H-1,2,4-triazole (Propiconazole) which readily mixes with various diluents to form a preservative solution.

Wood products for use in particle board and veneer production processes may be protected from sapstain and mold by the same treating processes recommended for freshly cut lumber and timber.

FOR STAIN AND MOLD CONTROL ON FRESHLY CUT LUMBER, TIMBERS, AND PEELED LOGS: Freshly cut wood should be treated within 24 hours. Otherwise, fungal attack may extend below the surface of the wood beyond the reach of a surface fungicide treatment. Freshly treated lumber should be protected from rain.

The longer the time between falling the log and sawn lumber production, the greater the incidence of pre-infection and the lower the level of stain and mold control will be achieved. This is particularly true of lumber from susceptible tree species such as pine, fir, hemlock, and yellow poplar.

Dip Tank and Across-the-Chain Applications:

The most cost effective strength of a Tuff Brite II solution will depend on the environment, the lumber treated, and the duration of control required.

Under **mild** stain and mold conditions, dilutions of 1 gallon of Tuff Brite II to 150 – 200 gallons of dip vat solution are recommended.

Under **moderate** stain and mold conditions, dilutions of 1 gallon of Premier with 100 to 125 gallons of dip vat solution are recommended.

Under **severe** stain and mold conditions, a dilution of 1 gallon of Premier to 50 to 75 gallons of dip vat solution are recommended.

Low Volume Spray Application:

For individual boards which are treated in low volume spray machines, add 1 gallon of Premier to 15 – 50 gallons of water. Smooth surfaced lumber normally retains only about one-half as much fungicide solution as rough cut wood and, therefore, needs the higher rate to deposit the necessary amount of fungicide on the wood.

(Directions for Use Continued)

Addition of a corrosion inhibitor is not required with Premier, as the formulation contains a built-in corrosion-inhibiting system.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if inhaled. Avoid breathing vapor or spray mist. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

- Coveralls worn over long sleeved shirt and long pants
- Chemical resistant footwear plus socks
- Goggles or face shield
- Chemical resistant gloves (such as: barrier laminate, butyl rubber, neoprene rubber, nitrile rubber, polyvinyl chloride (PVC) and viton)

For Cleaning Equipment:

- Chemical-resistant apron

User Safety Requirements:

Follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations:

- Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- User should remove personal protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly.

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 Environmental Protection Agency.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use near heat or open flame.

STORAGE & DISPOSAL

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then 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.

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 eye. • Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • 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.
In case of emergency call Chemtrec at 1-800-424-9300.	
Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.	

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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

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