

OCT 17 2012

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

Subject: CuRap 20 II
EPA Registration No.: 1022-591
Notification Date: September 17, 2012
EPA Receipt Date: September 19, 2012

Dear Ms. Watson,

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

Proposed Notification

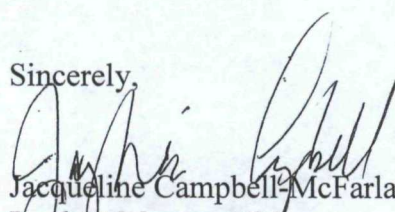
- Label revisions per PR Notice 2007-4, Storage & Disposal update.

General Comments

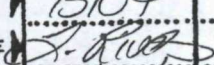
Based on a review of the submitted materials, your notification to revise your label to comply with PR Notice 2007-4 is acceptable. A copy of this letter has been made a part of the record on file for future reference.

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 Lorena Rivas by telephone at (703) 305-5027 or by e-mail at rivas.lorena@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,


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

CONCURRENCES

SYMBOL	7510P							
SURNAME								
DATE	10/22/12							



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1022-591	2. EPA Product Manager Campbell-McFarlane	3. Proposed Classification ☐ None ☐ Restricted
4. Company/Product (Name) CuRap 20 II	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) IBC Manufacturing Company 416 East Brooks Road Memphis, TN 38109 ☐ 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

☐ Amendment - Explain below.	☒ Final printed labels in response to Agency letter dated _____
☐ Resubmission in response to Agency letter dated _____	☐ "Me Too" Application.
☒ Notification - Explain below.	☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Minor Label Changes.

Notification to bring labels into compliance with PR Notice 2007-4. This notification is consistent with the provisions of PR Notice 98-10 and EPA 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 statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 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:

Child-Resistant Packaging ☐ Yes ☒ No	Unit Packaging ☐ Yes ☒ No	Water Soluble Packaging ☐ Yes ☒ No	2. Type of Container ☒ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information

☐ Label ☒ Container

4. Size(s) Retail Container

50# & 300#

5. Location of Label Directions

☐ on label

6. Manner in Which Label is Affixed to Product

☒ Lithograph
☒ Paper glued
☐ Stenciled

☐ 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 <i>Gail Watson</i>	Title Registrations Representative	Telephone No. (Include Area Code) 801-344-5316
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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

Gail Watson

3. Title

Registrations Representative

4. Typed Name

Gail Watson

5. Date

9/17/12

4/18

CuRap 20 II

Wood Preservative Paste

ACTIVE INGREDIENTS:

Copper Hydroxide*	3.1%
Sodium Tetraborate Decahydrate**	43.5%
Inert Ingredients	53.4%
TOTAL	100.0%

*Metallic Copper Equivalent 2.0%

**Boric Oxide (B₂O₃) Equivalent 16.4%

NOTIFICATION
Date Reviewed: 10/12/12
Reviewed By: [Signature]

Manufactured by:

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

EPA Reg. No. 1022-591

EPA Est. No. 1022-TN-001

Net Weight: _____

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
IF IN EYES:	- 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 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 by a Poison Control Center or doctor. - Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	- 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.
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.	
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.	

See back panel for additional Precautionary Statements.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING - Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles or face shield. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear long sleeve shirts and pants or must wear coveralls over short sleeve shirts and short pants, impermeable gloves and chemically resistant footwear with socks. When applying to in-service poles and ties, chemically resistant footwear is not required.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Use only with adequate ventilation. Close container after each use.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store product in original container only. Do not store with fertilizers, food and feed. Keep container closed when not in use. If product has been spilled or is leaking, remove the source of the spill or leak. Recover free liquid. Spread absorbent, then pick up and place in containers. Then where applicable, wash area with detergent and water.

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

CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. Triple rinse as follows:

Pails: Fill container ¼ full with water and recap. Shake for 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after flow begins to drip. Repeat procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Drums: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Plastic Liner: Completely empty plastic liner. Plastic liner and paper portions of packaging materials may be used as wraps to cover the CuRap 20 II treatment around the poles. Otherwise, dispose of empty bag(s) in a sanitary landfill or by incineration if allowed by State and local authorities.

DIRECTIONS FOR USE

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

This product is intended for the preservation of wood. Wood treated according to the following directions resists attack by decay and soft rot fungi, termites, carpenter ants, and wood boring beetles.

For utility poles, piling, posts, and other wood structures standing in the ground, excavate the soil away from the structure to the depth of about 18 inches. Brush the surface to remove adhering soil and any undamaged wood. Depending upon the degree of protection desired, apply from 1/16 to 1/2 inch of this product to the surface of the structure by spreading in a manner to achieve a consistent thickness from the bottom of the excavation to 3 inches above ground. Cover the treated surface with any contaminated packaging then with an impermeable wrap and back-fill around the structure. To treat internally decayed wood, inject this product into the affected area through drilled holes, then plug the drilled holes with tight-fitting wooden dowels. This product can be diluted with water if a less viscous solution is desired. To protect the ground line of poles, posts, and timbers before they are placed in the soil, apply this product in a pouch packaging to the structure from 6 inches above to 12 inches below the anticipated ground level. Slit the pouch along the marked lines and press this slit side tightly against the wood, then staple to the pole, post or timber.

For cross-ties, force 4.5 cubic inches of this product under the tie plate or apply 4.5 cubic inches to the tie plate area before the plate is put in place.

For untreated or insufficiently treated posts, poles, lumber, or timbers, drill a hole or holes as near the sapwood portion of the wooden member as possible. These holes should be a maximum of 1 inch in diameter and of sufficient depth that the wooden member will be completely treated by diffusion. Posts are conveniently treated with the bark intact by drilling holes in both ends. The holes should be filled with this product to within 1/2 inch of the surface, then capped with impermeable plugs. Sufficient product should be used to achieve a retention of from 1 to 21 pounds per cubic foot.

For unseasoned wood which will be used under minimum leaching conditions, dissolve 1 to 2 pounds of this product in water then brush, dip, or spray with the diluted product. Deeper penetration and greater protection is achieved if an extended dip time is used and the boards are maintained in the unseasoned state for at least 2 weeks to allow for full diffusion.

For seasoned wood which will be used under minimum leaching conditions, pressure treat using a full cell process to a retention ranging from 0.5 to 1 pound per cubic foot.

To protect wafer board from termites, add this product to the wood wafers in conjunction with the wax emulsion addition. Use a level sufficient to produce a preservative treated board containing from 1.0% to 2.5% of this product by weight.

To protect solid wood from termites apply this product to the surface of unseasoned, sawn or debarked structures. Shroud them in plastic wrap until the wood has absorbed 0.5 to 1.5 pounds per cubic foot of the applied wood preservative.

Residential use of this product is disallowed; except by commercial applicators.

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.

