

1022-594

01-03-2012

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

JAN - 3 2012

**FILE COPY**

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

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

Subject: **CuSol-1**  
EPA Registration No.: 1022-594  
Notification Date: 12/06/2011  
EPA Receipt Date: 12/08/2011

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**

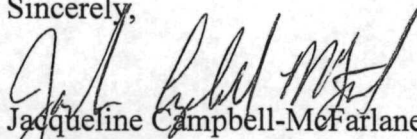
- Update of Container Disposal statements as per PR Notice 2007-4

**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](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at [carl.jaclyn@epa.gov](mailto: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,

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



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 1022-594	2. EPA Product Manager Campbell-McFarlane	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CuSol-1	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**

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.)

ADDING RESIDENTIAL DISPOSAL INSTRUCTIONS. 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 40 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:

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	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> 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  
1-quart, 1-gallon, 5-gallon

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	Title Registrations Representative	Telephone No. (Include Area Code) 901-344-5316
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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.

2. Signature  
*Gail Watson*

3. Title  
Registrations Representative

4. Typed Name  
Gail Watson

5. Date  
12/6/11

6. Date Application Received  
(Stamped)

December 6, 2011

Ms. Jacquie Campbell-McFarlane, Team Leader (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510W)  
U.S. Environmental Protection Agency  
Room S4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Re: Notification  
CuSol-1 (EPA Reg. No. 1022-594)  
Revised Label per PR Notice 2007-4

Dear Jacquie:

Enclosed please find a notification for the above product to add residential disposal instructions to the Storage and Disposal Statements. This product will be offered into the retail market and should carry appropriate disposal statements. I failed to add them during the initial registration process.

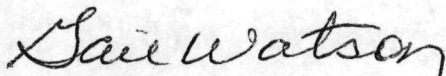
This submission includes:

- EPA Form 8570-1
- 1 copy of updated label language

Changes to the label have been marked for ease of review.

If you have questions or need additional information, I can be reached at 901-344-5316 or [watsong@ibio.com](mailto:watsong@ibio.com).

Sincerely,



Gail Watson  
Registrations Representative

gw

Enclosures





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# CuSol-1

Wood Preservative

FOR EXTERIOR USE ONLY

[Color statement(s)]

[Use statement(s)]

[Control statement(s)]

[Other statement(s)]

NOTIFICATION  
Date Reviewed: 1/3/2012  
Reviewed By: J. Cant

ACTIVE INGREDIENT:

Copper Monoethanolamine Complex (CAS No. 14215-52-2)	.....	2.92%*
Inert Ingredients:	.....	97.08%
Total:		100.00%

\*Metallic Copper equivalent 1%

EPA Reg. No. 1022-594

EPA Est. No. 1022-TN-001

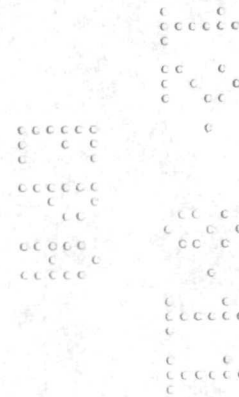
**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**See Back Panel for Precautionary Statements**

Net Contents:

Manufactured by:  
IBC Manufacturing Company  
416 East Brooks Road  
Memphis, Tennessee 38109  
901-344-5350



<b>FIRST AID</b>	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>• Call a Poison Control Center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>• Call a Poison Control Center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Call a Poison Control Center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to by a Poison Control Center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<p>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 of doctor or going in for treatment.</p>	
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
DANGER**

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

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

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and aquatic invertebrates and may contaminate water through runoff. For terrestrial uses, do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use or store near heat or open flame. Do not mix with oxidizers.

### DIRECTIONS FOR USE

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

Do not use wood treated with this preservative where it may come in contact with food, feed or potable water. Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.

CuSol-1 Wood Preservative is a multi-purpose, water-based exterior wood preservative and insecticide pre-treatment for below ground, ground contact, fresh water contact and above ground applications where either pressure-treated or non-pressure-treated wood has been used. When applied as directed, CuSol-1 provides protection against attack from termites and other wood boring insects and decay fungi, including mildew, mold, rot and decay organisms. This preservative will impart a color to wood that will fade over time, but if undesirable, can be top-coated with paint or stain.

CuSol-1 Wood Preservative requires no dilution before use. Use as received, following label directions.

**MANUFACTURED FOR USE ON:** Landscape timbers, railroad ties, fence posts, poles, pickets and rails, construction posts, foundation sills, steps, stairs, porches, siding, millwork, shakes, shingles, roofs, windows, window frames, doors, docks, piers, boats or other non-pressure-treated exterior wood exposed to moisture, weather or wood destroying insects. Also manufactured for pressure-treated wood end cut protection, especially on decks.

Since CuSol-1 Wood Preservative has very low phytotoxicity, it is manufactured to treat wood for greenhouses, nursery flats, etc. Pretreatment only. Do not apply at sites on or near water or wetlands.

Powder post beetles which invade structural lumber are killed by application of this preservative. These insects will not attack the treated wood. Wood to be protected against subterranean termites should be treated before use in construction. Termites will not attack wood properly treated with this preservative.

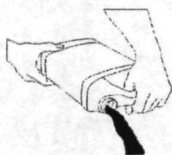
**BEFORE YOU START:** Make sure wood is dry and free of dust, dirt and debris. Stir or shake well before using. **IMPORTANT:** This product has a color that slowly fades with time, but can be stained or painted after 24 hours, or re-applied at any time. Always test in an inconspicuous area for color satisfaction.



[[[[[OPTIONAL LANGUAGE FOR ONE-QUART AND ONE-GALLON F-STYLE JUGS):

DISPENSING INSTRUCTIONS:

In order to ensure that the product does not glug or drip, remove cap and hold the jug so that the pour opening is to the one side. (See diagram below). Gently lift the bottom of the jug, while holding the top level, and tip the spout forward. Pour slowly, so that product pours in a continuous, coherent stream. When pouring is complete, return the jug to the upright position and replace the cap.



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APPLICATION PROCEDURES: Apply only when outside temperatures are between 50°F and 90°F, and when 24 hours of precipitation-free weather is expected. Apply only by dip treatment, brush, roller or pump sprayer.

Below Ground, Ground or Fresh Water Contact:

Manufactured for the treatment of seasoned (weathered) or green (new) wood. Make certain the wood is free of bark, then immerse in CuSol-1 for 12 to 48 hours or until the sapwood is completely penetrated. If dipping is not possible, 2 brush coats, roller or spray applications are to be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow wood to dry for 24 hours before installation.

Above Ground Contact:

Wood is to be immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller or spray applications are to be applied. Allow at least 1 hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to installation, painting and/or staining.

COVERAGE: One gallon covers 100 – 300 sq ft (9 – 28 m<sup>2</sup>), depending upon the wood age and species, surface porosity and method of application. One quart covers 25 – 75 sq. ft.

CLEAN-UP: Clean tools and equipment after use with soap and water.

Personal Protective Equipment (PPE):

Mixers, applicators and other handlers must wear:

- Coveralls worn over long sleeved shirt and long pants
- Chemical resistant footwear
- Chemical resistant gloves
- Goggles or Safety Glasses

When mixing, loading, or cleaning equipment, wear a chemical resistant apron. For overhead exposure, wear chemical-resistant headgear.





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

**STORAGE AND DISPOSAL (Residential)**

\*

Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use. Call local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain. Non-refillable container. Do not refill or reuse this container. Offer for recycling if available. If not, discard in trash.

**STORAGE AND DISPOSAL (Commercial/Industrial)**

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

**PESTICIDE STORAGE:**

Protect pesticide containers from heat and cold. The storage area must be secured, dry, well lit, and well-ventilated. Keep pesticide storage areas clean. Clean up any spills promptly. Always store pesticide in the original container. If a leaky container must be contained within another, mark the outer container to identify the contents.

**PESTICIDE DISPOSAL:**

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinsate is a violation of capital 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:**

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



**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.



Label to include any of the following statements

**(Color Statements)**

- Green Wood Preservative
- Black Wood Preservative
- Brown Wood Preservative
- Cedartone Wood Preservative
- Imparts Green Color
- Imparts Black Color
- Imparts Brown Color
- Imparts Cedartone Color
- With brown color additive
- Brown
- Cedar Color
- Green Color
- Imparts Brown Color to ensure complete coverage

**(Use Statements)**

- Above or Below Ground & Ground Contact
- Use above or below ground
- For wood in contact with soil and water
- Docks & Piers, Construction Posts, Fencing, and End Cuts
- End Cut Protection
- Ideal for End Cut Protection
- Landscape Ties, Fence Posts & Rails, and Construction Posts
- Construction Posts and Outdoor Decor
- Great for Small Projects
- Cedar Shake Roof Preservative
- Ground Contact Preservative
- Decks
- Fences
- Shakes
- Shingles
- Roofs
- Posts
- Pressure-Treated Wood End Cut Protection
- Exterior
- For Preserving Cedar Shake Roofs
- This product is not designed for application on decks, outdoor furniture or other structures intended for seating or heavy foot traffic.



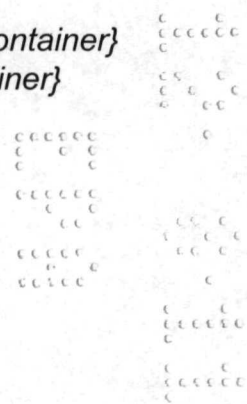
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**(Control Statements)**

- Prolongs the life of non-pressure treated wood
- Prevents termite and other insect attack
- Protects against rot and decay
- Resists mold, mildew and stain fungi
- Anti-wicking – controls moisture damage
- Stops rot, decay and insect attack
- Protects against wood rot, warping swelling, termite damage, mildew and moisture
- Kills powder post beetles, termite attack above or below the ground
- Prevents decay, warping & swelling
- Preserves Wood
- Wood Preservative
- Protects Against Decay

**(Other Statements)**

- Paintable and Stainable
- Deep Penetrating formula
- Easy soap and water clean-up
- Water clean up
- Note: application of product on redwood and cedar will darken wood.
- Ready to Use
- Made in USA
- Printed in USA
- Volatile Organic Compounds <350 gm./liter.
- VOS (excluding water) < 0.35 kg./liter
- VOC Content 221 g/L (1.84 lbs/gal)
- Preserve your wood and your warranty.
- Covers 100-300 sq. ft. (9-28m<sup>2</sup>) *{to be used on the 1-gallon container}*
- Covers 40-50 sq. ft. (4-5 m<sup>2</sup>) *{to be used on the 1-quart container}*





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(Other Statements - continued)

- The State Regulatory agency for the use of termiticides may have laws and rules that are more restrictive (including mandatory licensure or certification and specific use requirements) than these label directions and must be followed in addition to the label directions. This product must not be sold, or used by, a person not properly licensed by the State Regulatory Agency.
- For use by individuals/firms or registered by the state to apply Termiticide products. States may have more restrictive requirements regarding qualifications of person using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.
- States may have more restrictive requirements regarding qualification of person using this product. Consult the structural pest control regulatory agency of your state prior to the use of this product.
- When used as a Termiticide, individuals/firms must be licensed by the state to apply this product. States may have more restrictive requirements regarding qualifications of person using this product. Consult with your pest control regulatory agency of your state prior to use of this product.

