

1839-182

Thomas W. Isaac  
Sr. Regulatory Specialist  
Stepan Company  
22 W. Frontage Rd.  
Northfield, IL 60093

MAY 20 2010

SUBJECT: BTC WP80  
EPA Registration Number: 1839-182  
Application Date: March 10, 2010  
Receipt Date: March 11, 2010

Dear Mr. Isaac:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions listed below:

**Conditions**

1. Revise the Precautionary Statements to include the following: "...and skin burns. *May be fatal if swallowed or inhaled. Harmful if absorbed through the skin.* Do not get in eyes or on clothing. *Do not breathe vapor or spray mist....* soap and water after handling and before eating, drinking, using tobacco *or using the toilet.*
2. Revise the Environmental Hazards statement to include: "This pesticide is toxic to fish *and aquatic invertebrates.* Do not discharge..."
3. Revise the Container Disposal section to include the following information: "Offer for recycling if available *or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning* If burned, stay out of smoke."

**CONCURRENCES**

SYMBOL	7510P							
SURNAME	T. Isaac							
DATE	5/9/10							

The current rinsing instructions are incorrect for containers greater than 5 gallons. Delete the current rinsing instructions and add the following text for rinsing of containers greater than 5 gallons: *“Triple rinse container promptly after emptying. Triple rinse as follows: 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.”*

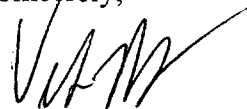
4. Revise page 2, Pressure Treatment and Double Vacuum sections to include mandatory language as per PR Notice 2000-5 as follows: “Treatment conditions *must* produce a 0.1 to 0.6 lb./cu.ft. retention in the treatment article.” and “Treatment conditions *must* produce a 0.1 to 0.6 lb./cu.ft. retention on DDAC in the treated article.”

5. Revise page 3, Dip Treatment and Brush or Spray sections to include mandatory language as per PR Notice 2000-5 as follows: “...*Dip times range from 30 seconds (individual pieces)...*”, “A 0.5% to 3.0% active solution with water is applied by brush...” “*Use low pressure equipment for spray applications...*”

**General Comments**

A stamped copy of the accepted labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble  
Product Manager (31)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

7510P:T.Lantz:5/8/10:1839-182 accept label

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

# BTC<sup>®</sup> WP80

A WOOD TREATMENT PRESERVATIVE

<b>ACTIVE INGREDIENT</b>	
Didecyl dimethyl ammonium chloride .....	80.0%
<b>INERT INGREDIENTS .....</b>	
	20.0%
<b>TOTAL .....</b>	<b>100.0%</b>

**KEEP OUT OF REACH OF CHILDREN**

## DANGER

See side panels for additional precautionary statements

EPA REG. NO. 1839-182  
EPA EST. NO. 1839-IL-01

**STEPAN COMPANY**  
22 W. Frontage Road  
Northfield, IL 60093 USA

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**MAY 20 2010**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1839-182

NET CONTENTS:

### DIRECTIONS FOR USE

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

Treatment can be done by brush or spray for wood shingle applications, and by pressure, double vacuum or dip method for other wood products. Wood articles that will be protected by these treatments would include millwork, construction timbers, decking, wood shingles and posts.

This product can be used in combination with other EPA registered organic and inorganic wood preservatives or it can be used alone.

#### BTC® WP80

Dilute this product in either water or mineral spirits to produce a 0.5% to 3.0% active quaternary ammonium compound solution.

Percent Active Quat Solution	Ounces of this product per gallon
0.5	0.8
1.0	1.6
1.5	2.4
2.0	3.2
2.5	4.0
3.0	4.8

To find the ounces of this product per gallon for other dilutions take the percent active desired and divide by 0.625.

#### BTC® WP80 AND COPPER COMPOUNDS

Mix this product with water and either ACQ-C2 (EPA Reg. No. 10465-36) or ACQ-C (EPA Reg. No. 10465-33). Refer to the product labels for ACQ-C2 or ACQ-C for precise mixing instructions.

Mix this product with water and either CMC 10.3 Wood Preservative, EPA Reg. No. 11435-4 or CMC 9.0 Wood Preservative, EPA Reg. No. 11435-5 for pressure treatment only. Refer to the product labels for CMC 10.3 or CMC 9.0 for precise mixing instructions.

#### BTC® WP80 AND BORATES

Mix this product and Tim-Bor (EPA Reg. No. 1624-39) in water and stir to give a solution of the desired concentration of components.

#### BTC® WP80 AND PROPICONAZOLE

Mix this product with either Woodlife P (EPA Reg. No. 1409-65) or Safetray P (EPA Reg. No. 43813-15) and dilute with either water, mineral spirits or other light organic solvent to produce a 0.5% to 3.0% quaternary ammonium compound solution. Follow the instructions on the Woodlife P or Safetray P label for the appropriate concentration of propiconazole. Please note that this formulation can only be used for dip treatment.

#### PRESSURE TREATMENT

Place the wood article to be treated into the pressure cylinder and seal unit. Treat the wooden articles using the pressure treatment procedures consistent with the equipment being used and standard treatment practices. Treatment conditions should be such as to produce a 0.1 to 0.6 lb./cu.ft. retention in the treatment article. Such treated wood is to be used for above ground uses only.

#### DOUBLE VACUUM

Stack the wooden articles to be treated in the treatment vessel so that the preservative solution will have access to all sides of the articles. Seal the vessel. Reduce the pressure within the vessel to -10 inches for 5 minutes. Cover all the articles with preservative solution. Allow the pressure to return to atmospheric conditions and discharge the preservative solution. Reduce the pressure to -20 inches and maintain for 20 minutes. Allow the pressure to return to atmospheric and remove treated wood articles. Treatment conditions should be used as to produce a 0.1 to 0.6 lb./cu.ft. retention of DDAC in the treated article. Wood treated to this retention for above ground use only.

**DIP TREATMENT**

Stack the wood to be treated on a suitable holder and convey the stack into the treating solution making sure the stack is completely immersed. Dip times should range from 30 seconds (individual pieces) up to 30 minutes (bundled wooden articles). Use a concentration of 0.5% to 3.0% active quaternary ammonium compound. The concentration should be customized to the degree of sapstain protection desired, which should be determined by an independent test on the intended species of wood.

**PERSONAL PROTECTION EQUIPMENT FOR PRESSURE TREATMENT, DOUBLE VACUUM AND DIP TREATMENT**

Applicators must wear gloves, which are chemical-resistant (such as nitrile or butyl) in all situations where dermal contact is expected (i.e. handling freshly treated wood and manually opening cylinder doors). Individuals who enter pressure treatment cylinders and other related equipment that are contaminated with the wood treatment solution (e.g. cylinders that are in operation or are not free of all treatment solution) must wear coveralls over a long sleeved shirt and long pants, socks, chemical-resistant footwear and protective eyewear. Federal, State and local confined space entry procedures need to be taken.

Applicators must not eat, drink or use tobacco products during those parts of the applications process that may expose them to the wood treatment formulation (e.g. manually opening/closing cylinder doors, moving trams out of cylinders, mixing chemicals, handling freshly treated wood).

Wash thoroughly after skin contact and before eating, drinking, use of tobacco products or using restrooms.

Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and work shoes or boots and equipment at the plant. Worn out protective clothing and work shoes or boots must be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with State and Federal regulations.

**BRUSH OR SPRAY**

A 0.5% to 3.0% active solution with water may be applied by brush or spray for use on wood shingles or shake roofs and siding on existing homes by commercial applicators. Low pressure equipment is recommended for spray applications. A moderately fine spray, not an aerosol or fog, generally provides the best coverage at practical product concentrations. Apply only to point of runoff. To make a 0.5 % to 3.0% active solution, use the following table:

Percent Active Quat Solution	Ounces of this product per gallon
0.5	0.8
1.0	1.6
1.5	2.4
2.0	3.2
2.5	4.0
3.0	4.8

To find the ounces of this product per gallon for other dilutions take the percent active desired and divide by 0.625.

**PERSONAL PROTECTION EQUIPMENT FOR BRUSH AND SPRAY APPLICATIONS**

Applicators must wear gloves, which are chemical-resistant (such as nitrile or butyl). Applicators must also wear coveralls over a long sleeved shirt and long pants, socks, chemical-resistant footwear and protective eyewear. Applicators must not eat, drink or use tobacco products during the application process. Use with adequate ventilation, mist or vapor generated by spraying this product may be harmful if inhaled. Wash thoroughly after skin contact and before eating, drinking, use of tobacco products or using restrooms. Protective clothing must be changed when it shows signs of contamination. Brush/Spray treatment may require frequent changing. Discard clothing and other absorbent materials that have been drenched or heavily contaminated. Do not reuse them.

Follow manufacturers instructions for cleaning/maintaining protective equipment. If no such instructions exist for washables, use detergent and hot water. Keep and wash protective equipment separate from other laundry.

Worn out protective clothing and work shoes or boots must be disposed of in a manner approved by pesticide disposal and in accordance with State and Federal regulations.

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. KEEP OUT OF REACH OF CHILDREN. Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Wear protective clothing and rubber gloves. Harmful if absorbed through skin. May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### 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 eye. Call a poison control center or doctor for treatment advice.

**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 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 to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**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. Call a poison control center or doctor for further treatment advice. **Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact xxx-xxx-xxxx for emergency medical treatment information.**

### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

### ENVIRONMENTAL HAZARD

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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame.

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE** – Store in a dry place no lower in temperature than 50°F or higher than 120°F. Store in tightly closed container in a secure area inaccessible to children.

*(For Industrial, Institutional, Commercial Products)*

**CONTAINER DISPOSAL** – Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after flow begins to drip. Fill container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

**PESTICIDE DISPOSAL** – Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture 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.