

2829-112

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 9, 2003

Ms. Valerie T. Phillip
Regulatory Specialist, CIS
Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA 19106-2399

Subject: **Cunilate 2419-75**
EPA Registration No. 2829-112
Application dated May 6, 2003

Dear Ms. Phillip:

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

Proposed Amendments

- Updated label per PR Notice 2001-1

Label Comments

The following revision must be made to the first aid statement.

1. The precautionary statement text must be in the same type size, except for the text heading, which should be in large bold type.
2. The storage and disposal statement must be revised to read as follows. Refer to PR Notice 83-3 for detailed information and proper format.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Triple rinse empty containers and offer for recycling.

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.

CONTAINER DISPOSAL. : Metal drums that cannot ve reconditioned and recycled should be punctured or crushed and disposed of in a landfill, or by other procedures approved by state and local authorities.

EMPTY DISPOSAL: This container is hazardous when empty. Do not use heat, sparks, open flames, torches, cigarettes on or near empty container since empty container retain product residues (vapor, liquid or solids). All labeled hazardous precautions must be observed. Do not reuse empty container for food, clothing or products for human or animal consumption or skin contact without professional.

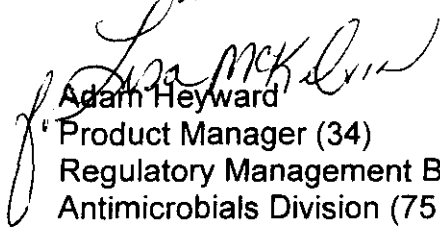
- 3. The EPA establishment number must be listed on the label.
- 4. Add the statement, "This product is toxic to fish" at the beginning of the environmental hazards statement.

General Comments

Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling. A stamped copy is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,


 Adam Heyward
 Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510C)

Enclosure

CUNILATE 2419-75

Fungistatic Treatment for Paperboard, Kraft Paper and Textiles for Protection Against Mildew and Decay Fungi



Lot Number
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Avg. Gross: LB KG
Net: LB KG
Avg. Tare: LB KG

Product Code
(91)

<p>ACTIVE INGREDIENT: Copper 8-quinolinolate 7.5%</p> <p>INERT INGREDIENTS: Total: 92.5%</p> <p>Contains the toxic inert Nonyl Phenol Total: 100.0%</p> <p style="text-align: center;">KEEP OUT OF REACH OF CHILDREN CAUTION FIRST AID</p> <p>IF ON SKIN:</p> <ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 min. Call a poison control center or doctor for advice. <p>IF IN EYES:</p> <ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 min. Remove contact lenses, if present, after first 5 min. then continue rinsing eye. Call a poison control center or doctor for treatment advice. <p>IF INHALED:</p> <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. Call a poison control center or doctor for advice. <p>IF SWALLOWED:</p> <ul style="list-style-type: none"> Call a poison control center or doctor immediately for advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person. <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p> <p>SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS</p>	<p style="text-align: center;">PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS</p> <p>CAUTION MAY BE HARMFUL IF SWALLOWED</p> <p>Avoid contact with skin, eyes, or clothing. Wash after handling. Avoid inhalation of vapors. Wear eye protection and rubber gloves when handling.</p> <p>ENVIRONMENTAL HAZARDS</p> <p>Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. 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 EPA.</p>	<p>STORAGE AND DISPOSAL</p> <p>Do not contaminate water, food or feed by storage or disposal. Triple rinse empty containers and offer for recycling. Metal drums that cannot be reconditioned and recycled should be punctured or crushed and disposed of in a landfill, or by other procedures approved by state and local authorities.</p> <p>Pesticide wastes are toxic. 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.</p> <p>CONDITIONS OF SALE AND WARRANTY.</p> <p>Rohm and Haas warrants that this product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. ROHM AND HAAS MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES, EITHER OF MERCHANTABILITY OR FITNESS, FOR A PARTICULAR USE. Handling, storage, and use of the product by Buyer or User are beyond the control of Rohm and Haas and Seller. Risks such as ineffectiveness or other unintended consequences resulting from, but not limited to, failure to follow directions will be assumed by the Buyer or User. IN NO CASE WILL ROHM AND HAAS OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE, OR USE OF THIS PRODUCT.</p> <p>Date of Manufacture: location for date EPA Reg. No. 2829-112 EPA Est. No. establishment number</p>	<p>DIRECTION</p> <p>It is a violation of labeling.</p> <p>Cunilate 2419 recommended provide a smoo prevent the for</p> <p>PAPER AND</p> <p>It is recommen incorporated in Military specif the shoe board</p> <p>Cunilate 2419 emulsions useo Cunilate is use</p> <p>TEXTILES</p> <p>It is recommen used on textile of copper -8-q repellents may should be conc the padder aft</p>
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ACCEPTED
with COMMENTS
EPA Letter Dated:
JUN - 9 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 2829-112