

2829-137

7-31-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

July 31, 2003

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

Subject: **Cunilate™ 2000**  
EPA Registration No. 2829-137  
Application Dated May 1, 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 Label Amendment**

Label revisions per PR Notice 2001-1

**Label Comments**

1. Revise the Storage and Disposal section to read:  
Storage and Disposal  
Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage:** (storage language)  
**Pesticide Disposal:**  
**Container Disposal:**

Refer to PR Notice 83-3 for detailed information.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

2. Based on the regulatory history of this product, the first statement should be listed as follows:

<b>FIRST AID</b>	
<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 by a Poison Control Center or doctor.</li> <li>-Do not give anything by mouth to an unconscious person</li> </ul>
<b>HOT LINE NUMBER</b>	
<p>In case of an emergency call toll free (registrants fill in the number). Have the product container or label with you when call a poison control center or doctor or going for treatment.</p>	
<b>NOTE TO PHYSICIAN</b>	
<p>"Probable mucosal damage may contraindicate the use of gastric lavage."</p>	

However, the Agency has no objections to you keeping the first aid statement as listed on your May 1, 2003 labeling.

3. The precautionary statement and subheading must be revised to read as follows:

**PRECAUTIONARY STATEMENTS**  
Hazards to Human and Domestic Animals  
**CAUTION**

Harmful if swallowed. Avoid contact with eyes and skin. Wear goggles or safety glasses and chemical resistant rubber gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

4. If you desire to keep the other languages in the precautionary statement on the label, it must be displayed as follows:

**General Precautions and Restrictions**

Do not apply this product to animals, plants, potable water, food or feed stuff. Do not use where treated wood will be in frequent or prolonged contact with bare skin. To prevent possible injury to desirable plants, plants should be covered if they may be contacted by solution.

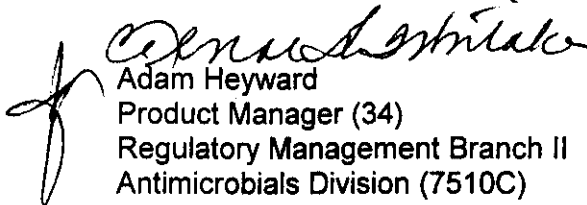
5. The EPA Establishment Number must be listed on the label.

**General Comments**

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

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



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

Enclosure

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

JUL 31 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 2829-137

# CUNILATE 2000

A Fungicide to Control Wood Decay

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

Product  
Code  
(91)



Lot  
Number  
( )



<p><b>ACTIVE INGREDIENT:</b> Copper 8-Quinolinate 10.0%</p> <p><b>INERT INGREDIENTS:</b> 90.0%</p> <p>Total: 100.0%</p> <p>Contains 0.87 lb active ingredient per gallon</p> <p><b>KEEP OUT OF REACH OF CHILDREN</b></p> <p><b>CAUTION</b></p> <p><b>FIRST AID</b></p> <p><b>IF IN EYES:</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul> <p><b>IF ON SKIN:</b></p> <ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 min.</li> <li>• Call a poison control center or doctor for advice.</li> </ul> <p><b>IF INHALED:</b></p> <ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth.</li> <li>• Call a poison control center or doctor for advice.</li> </ul> <p><b>IF SWALLOWED:</b></p> <ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for advice.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.</li> </ul> <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><b>PRECAUTIONARY STATEMENTS</b> <b>HAZARDS TO HUMANS AND DOMESTIC ANIMALS</b></p> <p><b>CAUTION</b> <b>HARMFUL IF SWALLOWED</b></p> <p>Do not allow contact with skin. Do not allow material to be splashed in eyes. Wear goggles and rubber gloves when handling. Do not apply this product to animals, plants, potable water, food or feedstuffs. Do not use where treated wood will be in frequent or prolonged contact with bare skin. To prevent possible injury to desirable plants, plants should be covered if they may be contacted by the solution during treatment.</p> <p><b>ENVIRONMENTAL HAZARDS</b> This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to water.</p>	<p><b>STORAGE AND DISPOSAL</b> <b>PESTICIDE DISPOSAL</b> Do not contaminate water, food or feed by storage or disposal. 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><b>CONTAINER DISPOSAL</b> Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and Local procedures.</p> <p><b>GENERAL</b> CONSULT FEDERAL, STATE, OR LOCAL DISPOSAL AUTHORITIES FOR APPROVED ALTERNATIVE PROCEDURES.</p> <p><b>CONDITIONS OF SALE AND WARRANTY</b> 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. 2829-137 EPA Est. No. establishment number</p>	<p><b>DIRECTIONS FOR USE</b> It is a violation of Federal law to use this product in a manner inconsistent with its labeling.</p> <p><b>FOR SAPSTAIN CONTROL</b> <b>General Information:</b> CUNILATE 2000 should be applied to freshly cut softwood or hardwood lumber and debarked timber within 24 hours of sawing or planing, especially in warm weather. The rate of CUNILATE 2000 selected should be appropriate to the lumber treated, the expected storage or shipping conditions expected and the duration of sapstain protection required. Use the higher rates recommended on hard to wet woods such as Douglas Fir, when disease conditions are severe, during warm humid weather, or when longer term protection from sapstain is needed.</p> <p>Treated wood should be protected from heavy rainfall until completely dry.</p> <p><b>Application:</b> Lumber and debarked timber is best treated with calibrated spray equipment. A dipping process can be used if the equipment allows complete coverage of the wood surface by the treatment mixture. The spray mixture or dip tank should be monitored to ensure that the selected dilution ratio of CUNILATE 2000 is maintained.</p>
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