UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

March 6, 2002

Ms. Teri Muchow Regulatory Specialist *OSMOSE, INC.* 980 Ellicott Street Buffalo, NY 14209

Subject:

Revised Labeling

NW 100

EPA Registration Number 3008-83 Application Dated January 4, 2002

Dear Ms. Muchow:

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

revised labeling

General Comments

Delete the statement "and other wood structures." All sites must be specified.

A stamped copy of the accepted labeling 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 further questions regarding this letter, please contact me at (703) 308-6422 or LaVerne Dobbins at (703) 308-6378.

Sincerely,

Adam Heyward

Product Manager (34)

Regulatory Management Branch II

Antimicrobials Division (7510C)Enclosure:

CONCURRENCES											
SYMBOL				************							
SURNAME)							**********				
DATE				***********							

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER, Corrosive. Causes skin hums and irroversible siye damagh. May be 1/21 if inhalled Hamilful if swallowed. Do not get in eyes, on skin, or clothing. Wear protective goggles or face shield, protective clothing, and rubber gloves. Do not breathe vapors. Wear a mask or pesticide respirator approved by the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause altergic reaction in some individuals. Individuals who enter pressure treatment cylinders and spray treatment booths/compartments contaminated with wood treatment solution (e.g. cylinders that are in operation or are not free of the treatment solution) must wear properly fitting, well-maintained, high-efficiency respirators, MSHA/NIOSH-approved for ammonia, if level of ammonia in the clant is unknown or secesds 35

ppm (STEL) or 25 ppm (ACGIH) of air averaged over an 8-hour work period, air monitoring

programs, procedures and record retention and submission must be conducted in accordance with

PERSONAL PROTECTION EQUIPMENT (PPE):

Applicators and other handlers must wear: coveralls worn over long sleeved shirt and long pants; chemical-resistant footwear plus socks; goggles or face shield; chemical-resistant gloves (such as barrier faminate, butly rubber, neoprene rubber, nitrile rubber, polytyniq chloride (PVC and Vitron). For cleaning equipment, a chemical-resistant aprox must also be worn. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instruction exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS:

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water or to areas where surface water is present or to intentidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of 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 to sewer systems without previously notifying the local sewage treatment authority. For guidance, contact your State Water Board or Regional Office of the EPA.

SAFE HANDLING PROCEDURES

Do not attempt to use without implementing the necessary safety equipment. Applicators must wear gloves impervious to wood treatment solutions in all situations where demail contact is expected (i.e. handling freshly treated wood, manually opening cylinder doors, etc.)

Individuals who enter treatment cylinders and other related equipment contaminated with wood treatment solutions must wear protective dothing, (including overalls, jacket, gloves, and boost, impervious to wood treatment solutions. In addition, individuals who enter treatment cylinders must wear properly fitting, well-maintained, high efficiency respirators that are MSHANIOSH-approved for ammonia. If level of ammonia in the plant is unknown or exceeds 35 ppm (STEL) or 25 ppm (ACGIH) or air averaged over an 8-hour work period, eir monitoring programs, procedures and record retention and submission must be conducted in accordance with OSHA Standards.

Applicators must not eat or drink, or use tobacco products during those parts of the application process that may expose them to the wood treatment concentrate or solutions (i.e. _manually opening/closing cylinder doors, moving trams out of the cylinder, mixing chemicals, handling freshly treated wood, etc.).

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

Protective clothing must be replaced when it shows signs of significant contamination. Applicator must leave all protective clothing, work shoes or boots, and equipment at the treatment plant. Wom out or severety contaminated protective clothing must be disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.

Refer to the NW 100 Material Safety Data Sheet for additional health and safety information

ACCEPTED with COMMENTS in EPA Letter Daniel:

MAR - 6 2002

NW 100

Wood Preservative Concentrate

ACTIVE INGREDIENTS:
Copper as elemental* 7.4%
n-Alkyl (67%C12, 25% C14,
7%C15, 1% C19) dimethyl benzyl
ammonium chloride 4.6%
INERT INGREDIENTS: 88.0%
TOTAL: 100.0%

*from mixed copper ethanolamine complexes, expressed as copper oxide equivalent 9.2%

KEEP OUT OF REACH OF CHILDREN DANGER

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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of an emergency, for additional information call CHEMTREC toll free at 1-800-424-9300.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 3008-83

EPA Est. No. 3008-TN-1

Manufactured by:

Osmose, Inc. 980 Ellicott Street Buffalo, NY 14209

Net Contents: _____

DIRECTIONS FOR USE

It is a violation of Federal law () us a this product in a manner inconsistent with its labeling.

GENERAL INFORMATION

NW 100 is a formulation of copper oxide as elemental copper (from copper ethanolamine complexes) and alkyl dimethyl benzyl ammonium chloride for the formulation of amine copper qual wood preservative solutions. Wood treated with NW 100 may be used in the construction of decks, fences, gazebos, walkways, park benches, retaining walls, fresh water docks, grape stakes and other wood structures.

The contents are for use in vacuum-pressure or spray application treatment systems for wood products. Wood products should only be treated with water dilution's raging from 0.5% to 10% active ingredients(s) by weight. Impregnation procedures must rigidly adhere to applicable specifications of the American Wood Preservers' Association. Treated wood is provided protection against termites and wood decay fungi.

Note: Do not use in contact with brass, bronze or copper.

SPECIFIC USE INSTRUCTIONS For NW 100 Solutions:

Refer to mixing instructions in the attached Technical Bulletin.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry, well ventilated area.

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 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved of by state and local authorities.

CONDITIONS OF SALE AND WARRANTY

Seller warrants that this product conforms to the standard specifications set forth on this label. SELLER MAKES NO OTHER REPRESENTATIONS OR WARRANTIES OF ANY KIND, AS TO THE MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE, OR ANY OTHER MATTER WITH RESPECT TO THIS PRODUCT WHETHER USED ALONE OR IN COMBINATION WITH ANY OTHER MATERIAL. BUYER ASSUMES ALL RISKS TO PERSONS OR PROPERTY ARISING OUT OF THE USE OR HANDLING AND ACCEPTS THE PRODUCT SUBJECT TO THE CONDITIONS SET FORTH ON THIS LABEL. BECAUSE TIME, GEOGRAPHICAL LOCATION, RATE OF APPLICATION, AND OTHER CONDITIONS ARE BEYOND SELLER'S CONTROL. SELLER'S LIABILITY FOR ANY LOSS OR DAMAGES ARISING OUT OF ANY CAUSE INCLUDING STORAGE, HANDLING AND USE OF THIS PRODUCT SHALL IN NO EVENT EXCEED THE PURCHASE PRICE OF THE PRODUCT, IN RESPECT TO WHICH SUCH CAUSE ARISES OR AT THE SELLER'S OPTION THE REPLACEMENT OF SUCH PRODUCT, AND IN NO EVENT SHALL SELLER BE LIABLE FOR INCIDENTAL, SPECIAL, CONSEQUENTIAL, OR PUNITIVE DAMAGES RESULTING FROM ANY CAUSE. No claim for any cause whatspever shall be allowed unless Buyer gives Seller prompt written notice thereof. Failure to commence action with respect to such claim within one year from the date of delivery of NW 100 for which a claim is alleged, shall constitute a waiver by Buyer of any such claim.

12/01

NW 100 TECHNICAL BULLETIN

NW 100 MIXING TABLE To Mix 1000 Gallons of Solution

% Solution	Gallons NW 100 Conc.	Galions Water	% Solution	Gallons NW 100 Conc.	Gallons Water	% Solution	Gallons NW 100 Conc.	Gallons Water
0.50%	31.1	968.9	3.70%	236.9	763.1	6.90%	455.4	544.6
0.60%	37.3	962.7	3.80%	243.5	756.5	7.00%	462.5	537.5
0.70%	43.6	956.4	3.90%	250.2	749.8	7.10%	469.5	530.5
0.80%	49.9	950.1	4.00%	256.8	743.2	7.20%	476.5	523.4
0.90%	56.2	943.8	4.10%	263.5	736.5	7.30%	483.7	516.3
1.00%	62.5	937.5	4.20%	270.2	729.8	7.40%	490.8	509.2
1.10%	68.8	931.2	4.30%	276.9	723.1	7.50%	497.9	502.1
1.20%	75.1	924.9	4.40%	283.6	716.4	7.60%	505.0	495.0
1.30%	81.4	918.6	4.50%	290.3	709.7	7.70%	512.2	487.8
1.40%	87.8	912.2	4.60%	297.0	703.0	7.80%	519.3	480.7
1.50%	94.1	905.9	4.70%	303.8	696.2	7.90%	526.5	473.5
1.60%	100.5	899.5	4.80%	310.5	689.5	8.00%	533.7	466.3
1.70%	106.9	893.1	4.90%	317.3	682.7	8.10%	540.9	459.1
1.80%	113.2	886.8	5.00%	324.1	675.9	8.20%	548.1	451.9
1.90%	119.6	880.4	5.10%	330.9	669.1	8.30%	555.3	444.7
2.00%	126.1	873.9	5.20%	337.7	662.3	8.40%	562.6	437.4
2.10%	132.5	867.5	5.30%	344.5	655.5	8.50%	569.8	430.2
2.20%	138.9	861.1	5.40%	351.3	648.7	8.60%	577.1	422.9
2.30%	145.4	854.6	5.50%	358.2	641.8	8.70%	584.4	415.6
2.40%	151.8	848.2	5.60%	365.1	634.9	8.80%	591.7	408.3
2.50%	158.3	841.7	5.70%	371.9	628.1	8.90%	599.0	401.0
2.60%	164.8	835.2	5.80%	378.8	621.2	9.00%	606.3	393.7
2.70%	171.3	828.7	5.90%	385.7	614.3	9.10%	613.6	386.4
2.80%	177.8	822.2	6.00%	392.6	607.4	9.20%	621.0	379.0
2.90%	184.3	815.7	6.10%	399.5	600.5	9.30%	628.4	371.6
3.00%	190.8	809.2	6.20%	406.5	593.5	9.40%	635.7	364.3
3.10%	197.4	802.6	6.30%	413.4	586.6	9.50%	643.1	355.5
3.20%	203.9	796.1	6.40%	420.4	579.6	9.60%	650.6	349.4
3.30%	210.5	789.5	6.50%	427.4	572.6	9.70%	658.0	342.0 .
3.40%	217.1	782.9	6.60%	434.4	565.6	9.80%	665.4	334.6
3.50%	223.7	776.3	6.70%	441.4	558.6	9.90%	672.9	327.1
3.60%	230.3	769.7	6.80%	448.4	551.6	10.00%	680.4	319.6