

3008-87

3/12/2008

1/4



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 12, 2008

Teri Muchow
Manager-Regulatory Administration
Osmose, Inc.
980 Ellicott Street
Buffalo, NY 14209

Subject: Product Name: NW 100-C
EPA Registration Number: 3008-87
Letter Date: 15-Feb-2008
Receipt Date: 19-Feb-2008

Dear Ms. Muchow:

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

Proposed amendment:

- Revised labeling

General Comments:

A copy of the stamped label is enclosed for your record.

If you have further questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at heyward.adam@epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

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

Enclosure: Stamped labeling

ACCEPTED

MAR 12 2008

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. **3008-87**

**Precautionary Statements
Hazards to Humans and Domestic Animals**

NW 100-C

DIRECTIONS FOR USE

DANGER

Corrosive. Causes irreversible eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed, absorbed through the skin or inhaled. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

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 laminate, butyl rubber, neoprene rubber, nitrile rubber, polyvinyl chloride (PVC and Viton). For cleaning equipment, a chemical-resistant apron 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 intertidal 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 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 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 dermal 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 clothing, (including overalls, jacket, gloves, and boots), impervious to wood treatment solutions. In addition, individuals who enter treatment cylinders must wear properly fitting, well-maintained, high efficiency respirators that are MSHA/NIOSH-approved for ammonia. If level of ammonia in the plant is unknown or exceeds 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 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. Worn out or severely contaminated protective clothing must be disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.

For the control of wood damaging fungi and insects.

ACTIVE INGREDIENTS:

Copper as elemental*..... 9.0%
 INERT INGREDIENTS:..... 91.0%
 TOTAL..... 100.0%
 *From mixed Copper ethanolaniline complexes.

**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.

EPA Reg. No.: 3008-87
 EPA Est. No.: 3008-TN-001 3008-SC-001 55953-CN-001

Sold by: **Osiose, Inc.**
 980 Ellicott Street
 Buffalo, NY 14209

NET Contents: _____ Gallons

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Use NW 100-C to control all types of fungal decay of wood products - brown, white and soft rot and wood eating insects, including termites. NW 100-C should be used to treat any wood product that will be exposed to conditions favorable to rot, decay or insect attack both above and in ground, or water. Types of products include lumber, timbers, landscape ties, fence posts, building and utility poles, land, freshwater and marine piling, sea walls, decking and wood shingles.

Tank mix NW 100-C with quaternary ammonium compounds approved for wood treatment. Apply the tank mix solution by pressure impregnation. Follow the mixing instructions "Solution Mixing Table for NW 100-C (2 component)", for obtaining the desired solution concentration. The percent solution to be used should be based on the retention, in lbs., per cubic foot (pcf), specified by the purchaser and by the treating process used.

A 3% solution can be used to field coat the cut ends of pressure treated wood by brush-on application.

STORAGE AND DISPOSAL:

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

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 of guidance.

CONTAINER DISPOSAL:

Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill.

Handwritten initials

3/4

MIX CHART #1
Mixing Table for NW 100-C + Quaternary Ammonium Compound
Copper/Quat 2:1 Ratio

Solution Strength % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Solution Combine following Gallons of		
	CuO	QUAT	NW 100-C	QUAT (50%)	Water
0.60%	0.400%	0.200%	28.1	4.17	967.7
0.65%	0.433%	0.217%	30.5	4.52	965.0
0.70%	0.467%	0.233%	32.8	4.87	962.3
0.75%	0.500%	0.250%	35.2	5.23	959.6
0.80%	0.533%	0.267%	37.6	5.58	956.9
0.85%	0.567%	0.283%	39.9	5.93	954.1
0.90%	0.600%	0.300%	42.3	6.28	951.4
0.95%	0.633%	0.317%	44.7	6.64	948.7
1.00%	0.667%	0.333%	47.1	6.99	945.9
1.10%	0.733%	0.367%	51.8	7.70	940.5
1.20%	0.800%	0.400%	56.6	8.41	935.0
1.30%	0.867%	0.433%	61.4	9.12	929.4
1.40%	0.933%	0.467%	66.2	9.84	923.9
1.50%	1.000%	0.500%	71.1	10.55	918.4
1.60%	1.067%	0.533%	75.9	11.27	912.8
1.70%	1.133%	0.567%	80.7	11.99	907.3
1.80%	1.200%	0.600%	85.6	12.71	901.7
1.90%	1.267%	0.633%	90.5	13.43	896.1
2.00%	1.333%	0.667%	95.4	14.16	890.5
2.10%	1.400%	0.700%	100.2	14.89	884.9
2.20%	1.467%	0.733%	105.2	15.61	879.2
2.30%	1.533%	0.767%	110.1	16.35	873.6
2.40%	1.600%	0.800%	115.0	17.08	867.9
2.50%	1.667%	0.833%	120.0	17.81	862.2
2.60%	1.733%	0.867%	124.9	18.55	856.5
2.70%	1.800%	0.900%	129.9	19.29	850.8
2.80%	1.867%	0.933%	134.9	20.03	845.1
2.90%	1.933%	0.967%	139.9	20.77	839.4
3.00%	2.000%	1.000%	144.9	21.51	833.6
3.10%	2.067%	1.033%	149.9	22.26	827.8
3.20%	2.133%	1.067%	154.9	23.01	822.1
3.30%	2.200%	1.100%	160.0	23.76	816.3
3.40%	2.267%	1.133%	165.0	24.51	810.4
3.50%	2.333%	1.167%	170.1	25.26	804.6
3.60%	2.400%	1.200%	175.2	26.02	798.8
3.70%	2.467%	1.233%	180.3	26.77	792.9
3.80%	2.533%	1.267%	185.4	27.53	787.0
3.90%	2.600%	1.300%	190.6	28.29	781.2

ACCEPTED

MAR 12 2008

Under the Federal Insecticide, Fungicide, and
 Rodenticide Act as amended, for the
 pesticide registered under
 EPA Reg. No. 3006-87

4/4

MIX CHART #2
Mixing Table for NW 100-C + Quaternary Ammonium Compound
Copper/Quat 1:1 Ratio

Solution Strength, % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Solution Combine following Gallons of		
	CuO	Quat	NW 100-C	Quat (50%)	Water
0.30%	0.150	0.150	10.49	3.13	986.4
0.40%	0.200	0.200	14.00	4.18	981.8
0.50%	0.250	0.250	17.52	5.23	977.3
0.60%	0.300	0.300	21.04	6.28	972.7
0.70%	0.350	0.350	24.57	7.34	968.1
0.80%	0.400	0.400	28.11	8.39	963.5
0.90%	0.450	0.450	31.65	9.45	958.9
1.00%	0.500	0.500	35.20	10.51	954.3
1.10%	0.550	0.550	38.75	11.57	949.7
1.20%	0.600	0.600	42.31	12.63	945.1
1.30%	0.650	0.650	45.88	13.70	940.4
1.40%	0.700	0.700	49.46	14.77	935.8
1.50%	0.750	0.750	53.04	15.83	931.1
1.60%	0.800	0.800	56.63	16.91	926.5
1.70%	0.850	0.850	60.22	17.98	921.8
1.80%	0.900	0.900	63.82	19.05	917.1
1.90%	0.950	0.950	67.43	20.13	912.4
2.00%	1.000	1.000	71.04	21.21	907.7
2.10%	1.050	1.050	74.67	22.29	903.0
2.20%	1.100	1.100	78.29	23.38	898.3
2.30%	1.150	1.150	81.93	24.46	893.6
2.40%	1.200	1.200	85.57	25.55	888.9
2.50%	1.250	1.250	89.22	26.64	884.1
2.60%	1.300	1.300	92.87	27.73	879.4
2.70%	1.350	1.350	96.54	28.82	874.6
2.80%	1.400	1.400	100.20	29.92	869.9
2.90%	1.450	1.450	103.88	31.01	865.1
3.00%	1.500	1.500	107.56	32.11	860.3
3.10%	1.550	1.550	111.25	33.21	855.5
3.20%	1.600	1.600	114.95	34.32	850.7
3.30%	1.650	1.650	118.65	35.42	845.9
3.40%	1.700	1.700	122.36	36.53	841.1
3.50%	1.750	1.750	126.08	37.64	836.3
3.60%	1.800	1.800	129.80	38.75	831.4
3.70%	1.850	1.850	133.53	39.87	826.6
3.80%	1.900	1.900	137.27	40.98	821.7
3.90%	1.950	1.950	141.02	42.10	816.9