

3008-87

04-13-2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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WASHINGTON, D.C. 20460

APR 13 2011

Teri Muchow
Osmose, Inc.
980 Ellicott Street
Buffalo, NY 14209

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: **NW 100-C**
EPA Registration Number: 3008-87
Application Date: March 10, 2011
Receipt Date: March 10, 2011

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 conditions.

Proposed Amendment

- Update label per PR Notice 2007-4

Label Conditions

Revise the label as follows:

- 1.) The "Precautionary Statements" must be revised by adding the following statement:

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

General Comments

A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 email address at grigsby.stacey@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Jacqueline Campbell-McFarlane
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: EPA stamped label

CONCURRENCES

SYMBOL	SURNAME	DATE					

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

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 Vitron). For cleaning equipment, a chemical-resistant apron must also be worn. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instruction exists for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber, neoprene rubber, nitrile rubber, polyvinyl chloride (PVC and Vitron). If you want more options, follow the instructions for category C on an EPA chemical-resistance category selection chart.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

User Safety Recommendations

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

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates and may contaminate water through runoff. This product has a potential for runoff for several months or more after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product. For terrestrial uses, do not apply directly to water, 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 wash-waters or rinsate. Certain water conditions including low pH (5.6.5), low dissolved organic carbon (DOC) levels (3.0 mg/L or lower), and "soft" waters (i.e. alkalinity less than 50 mg/L), increases the potential acute toxicity to non-target aquatic organisms. 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.

NW 100-C

For the control of wood damaging fungi and insects.

ACTIVE INGREDIENTS:

Copper ethanolamine complex..... 15.5%
(CAS No. 14215-52-2).

INERT INGREDIENTS:..... 84.5%
TOTAL.....100.0%

Copper as elemental = 9.0%

**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: Osмосе, Inc.
980 Ellicott Street
Buffalo, NY 14209

NET Contents: _____ Gallons

Under the F...
with EP...
AP...
5/1/...
200...

NW 100-C

DIRECTIONS FOR USE

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Copper ethanalamine complex..... 15.5%
(CAS No. 14215-52-2).

INERT INGREDIENTS:..... 84.5%

TOTAL.....100.0%

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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 must 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 must 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.

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DANGER**

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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.

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:

TOTES: Nonrefillable container. Do not reuse this container to hold materials other than pesticides or dilute pesticides (rinsate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Empty tote container must be returned to a tote collection service. Contact product supplier for additional information.

Residue removal: Cleaning container before final disposal is the responsibility of the person disposing of the container. To clean container before final disposal, fill container about 10 percent full with water; agitate container vigorously; discard rinsate according to pesticide disposal instructions; repeat this rinsing procedure two more times. For additional container disposal information, contact product supplier.

EPA Reg. No.: 3008-87

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

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

NET Contents: _____ Gallons

ACCEPTED
with COMMENTS
EPA Letter # 2011-01
APR 13 2011

MAR 2011

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

7/12

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

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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