

JUN - 7 2006

Ms. Teri Muchow  
Manager, Regulatory administration  
Osmose, Inc.  
980 Ellicott Street  
Buffalo, Ny 14209

Subject: Notification in Accordance with PR Notice 98-10  
ORd-X280  
EPA Registration No. 3008-94  
Application Dated April 25, 2006

Dear Ms. Muchow,

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 98-10, FIFRA section 39c)9.

**PROPOSED NOTIFICATION**

Addition of alternate brand name (O-Life wood Preservative)

**GENERAL COMMENTS**

Based on a review of the material submitted, the following comment apply.

The notification application is acceptable. A copy has been inserted in the file for future reference.

Should you have any questions or comments concerning this letter, please contact Zenobia Jones at (703) 308-6198.

Sincerely,



Velma Noble  
Product Manager 31  
Regulatory Management Branch 1  
Antimicrobial Division (7510C)



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency Washington, DC 20460	<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 3008-94	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ORD-X280	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) Osmoste, Inc. 980 Ellicott Street Buffalo, NY 14209 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of alternate brand name per PR Notice 98-10.  
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes" Unit Packaging wgt. No. per container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Package wgt No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Not for retail sale		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Teri Muchow	Title Manager - Regulatory Administration	Telephone No. (Include Area Code) 716-319-3255
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b>
2. Signature <i>Teri Muchow</i>	3. Title Manager - Regulatory Administration	
4. Typed Name Teri Muchow	5. Date April 25, 2006	

3 1 1 0 1 3 0 2

April 25, 2006

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
US Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1801 South Bell Street  
Arlington, VA 22202-4501

Re: ORD-X280, Reg. No. 3008-94  
Notification of Alternate Brand Name

Dear Velma:

In accordance with PR Notice 98-10, I hereby notify US EPA that ORD-X280, EPA Reg. No. 3008-94, will also be distributed under the following alternate brand name: **O-Life Wood Preservative**. Enclosed is a copy of the label with the alternate brand name.

If you have any questions regarding the enclosed materials, please contact me. I may be reached by phone at (716) 319-3255 or by email at [tmuchow@osmose.com](mailto:tmuchow@osmose.com).

Sincerely,



Teri Muchow  
Manager -  
Regulatory Administration

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Do not get in eyes, on skin or clothing. Do not breathe vapor. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Harmful if absorbed through the skin.

### Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Wear chemical resistant (i.e. rubber, nitrile, neoprene, Tyvek, etc.) body protection appropriate for task - apron or complete suit.
- Wear chemical resistant (rubber, neoprene or nitrile) gloves for routine industrial use. Use double gloves for spill response.
- Chemical-resistant footwear plus socks
- Wear chemical splash goggles and a face shield when there is a potential for eye contact (splashes, sprays, mists).

Individuals who enter pressure treatment cylinders and other related equipment that are contaminated with the wood treatment solution (e.g., cylinders that are in operation or are not free of the treatment solution) must wear the following PPE: long-sleeved shirt and long-pants, chemical-resistant gloves, chemical resistant footwear plus socks, protective eyewear and a respirator with an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter.

Protective clothing must be changed when it shows signs of contamination. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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 formulation (e.g., manually opening/closing cylinder doors, moving trams out of cylinders, chemicals, handling freshly treated wood).

### ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not contaminate water by cleaning of equipment or disposal of wash waters. 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 plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

## O-Life Wood Preservative

### Active Ingredients:

Didecyl dimethyl ammonium carbonate and Didecyl

dimethyl ammonium bicarbonate ..... 16.66%

Inert Ingredients..... 83.34%

Total : 100.00%

Contains 8.1 lbs. of product per gallon

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If in eyes:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If on skin or clothing:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed:	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have a person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If inhaled:	<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 if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed.	

SEE LEFT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Registration No. 3008-94

EPA Establishment No.:  6836-IL-1

3008-TN-1

Net Contents: \_\_\_\_\_

Distributed by  
Osmose, Inc., 980 Ellicott Street, Buffalo, NY 14209

O-Life Wood Preservative is a waterborne preservative used to protect treated wood articles from the destructive attack of fungi, mold and mildew. O-Life Wood Preservative is intended to treat wood used above ground. Examples are decking, railings, spindles, trim and fascia, siding, flooring, trellises, and fencing.

### DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

O-Life Wood Preservative is an end-use product. Prepare a use-solution (0.6 - 3.9% active) by mixing O-Life Wood Preservative with water. A closed-system must be used when preparing the use-solution and for delivery of the use-solution to the treatment vessel.

### PRESSURE TREATMENT INSTRUCTIONS

Place the wood article to be treated into the pressure cylinder and seal unit. Treat the wooden articles using the pressure treatment procedures consistent with the equipment being used and standard treatment practices. Treatment conditions must be calibrated to yield a 0.05 to 0.2 lb/ft<sup>3</sup> (0.8 to 3.2 kg/m<sup>3</sup>) active retention in the treated article of didecyl dimethyl ammonium carbonate/bicarbonate. A final vacuum should be used during treatment process to remove any excess treatment solution from surface of treated wood article.

**NOTE:** O-Life Wood Preservative cannot be used to treat wood intended for direct continuous salt water (marine) immersion. Treated wood must be marked accordingly. In addition, O-Life Wood Preservative is not approved for treating wooden articles that are used or intended for use in the packaging of food or feed.

### STORAGE AND DISPOSAL

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

#### PESTICIDE STORAGE:

Do not store on side. Avoid creasing or impacting of side walls.

#### PESTICIDE DISPOSAL:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these pesticides 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:

##### Plastic Container:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

##### Metal Container:

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

**Technical Bulletin**  
**O-Life Wood Preservative**  
**Wood Preservative for Pressure Treatment**

**1. Introduction**

O-Life Wood Preservative is a waterborne preservative used to protect wood articles from the destruction by fungal decay, mold and mildew. O-Life Wood Preservative is to be applied only by wood preserving plants to pressure treat wood articles.

Wood articles treated with O-Life Wood Preservative are appropriate for **above-ground use only**. Examples are decking, railings, spindles, trim and fascia, siding, flooring, trellises, and fencing.

**2. Description of the Preservative System**

O-Life Wood Preservative is an end-use product intended for sale to wood treating plants.

O-Life Wood Preservative is shipped as a 16.66 percent concentrate. It must be diluted with water. Treatment conditions must be calibrated to yield a 0.05 to 0.2 lb/ft<sup>3</sup> (0.8 to 3.2 kg/m<sup>3</sup>) active retention in the treated article of didecyl dimethyl ammonium carbonate/bicarbonate. A final vacuum should be used during treatment process to remove any excess treatment solution from surface of treated wood article.

**3. Materials to be Treated**

O-Life Wood Preservative is used to pressure treat the following materials:

- 3.1 Dimensional lumber of the following sapwood species: Southern Pine, Ponderosa Pine, Red Pine, Radiata Pine and Caribbean Pine;
- 3.2 Dimensional lumber of the following heartwood species: Douglas-Fir, Western Hemlock, Hem-Fir, Lodgepole Pine, Jack Pine and Redwood;
- 3.3 Maximum nominal size of 2-by-6 in all listed species for decking use only;
- 3.4 Southern Pine and Douglas-Fir plywood;

#### 4. Wood Treatment

**Plant Equipment:** Treating plants shall be equipped with the thermometers, gauges, and recorders necessary to indicate and record accurately the conditions within the treating cylinder during all stages of treatment. Whenever it is practicable the material in any charge shall consist of pieces of the same species similar in form and size, moisture content and receptivity to treatment.

**Marking:** Lumber and plywood shall be marked to indicate the intended end use "above ground."

**Manner of Treatment:** The material shall be impregnated with preservative by a combination of such processes and under such conditions as will produce a satisfactory product for the use intended as described below:

**Vacuum Treatment:** Prior to introduction of preservative, material shall be subjected to a vacuum of not less than -77kPa (22 in. Hg, sea level equivalent). Fill cylinder with preservative under vacuum, release vacuum to allow for solution absorption and then empty cylinder when required uptake is achieved. After cylinder has been emptied of preservative, a vacuum of not less than -77kPa (22 in. Hg, sea level equivalent) may be applied resulting in the material having drier surfaces upon removal from the cylinder.

**Empty Cell Treatment:** Prior to the introduction of preservative, material shall be subjected to atmospheric air pressure or to higher air pressures of the necessary intensity and duration. A final vacuum of not less than -77 kPa (22 in. Hg) shall be used.

**Modified Full Cell Treatment:** Prior to introduction of preservative, material shall be subjected to a vacuum of less than -77 kPa (22 in. Hg) (sea level equivalent). A final vacuum of not less than -77 kPa (22 in. Hg) shall be used.

**Full Cell Treatment:** Prior to introduction of preservative or during any period of condition prior to treatment, material shall be subjected to a vacuum of not less than -77kPa (22 in. Hg.) (sea level equivalent). A final vacuum of not less than 560 Kg/m<sup>3</sup> (22 in.) of mercury shall be used. Initial Air Pressure or Vacuum shall be maintained while the cylinder is being filled with preservative. Pressure shall be maintained until the desired volumetric injection has been obtained.

At the conclusion of the pressure period and after the cylinder has been emptied of preservative, a vacuum of not less than -77kPa (22 in. Hg.) at sea level may be created. This results in the material having drier surfaces upon removal from the cylinder.

**5. Results of Treatment**

**Preservative Retention:** Retentions shall be determined by wood assay or by plant gauge. Where retention by assay is specified, the retention shall be determined by extraction or analysis of the treated wood. Where retention by gauge is specified, the amount of preservative solution retained shall be determined from readings of working tank gauges or scales.

The vacuum-pressure treating process described in American Wood-Preservers' Association (AWPA) Commodity Standard C1-00 and in the Processing and Treatment Standard of the Use Category System (UCS) shall be used to produce wood articles treated with O-Life Wood Preservative.

**6. Installation and Application**

Wood articles pressure treated with O-Life Wood Preservative are installed as preservative-treated lumber in accordance with requirements of the applicable Code. The industry published installation instructions for wood and pressure-treated wood shall be strictly adhered to.

Wood articles pressure treated with O-Life Wood Preservative are permitted in locations where wood is used and/or in locations required by the applicable Code to use building materials which are fungal decay resistant. The treated wood members are listed for use in above-ground applications.

Surface treat cut ends with appropriate registered preservative solution.

Locations requiring preservative-treated wood for fungal decay are listed in:

Section 2304.11	<i>International Building Code</i>
Section 2304	<i>Standard Building Code</i>
Section 2311	<i>BOCA National Building Code</i>
Section 2306	<i>Uniform Building Code™</i>
Sections R323, R324	<i>International Residential Code™ for One- and Two-Family Dwellings</i>
Sections 322, 323	<i>International One and Two Family Dwelling Code.</i>