



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 10, 2008

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

Subject: Product Name: ORD-X400
EPA Reg. Number: 3008-99
Application Date: 24-Jul-2008
Receipt Date: 25-Jul-2008

Dear Ms. Muchow:

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

Proposed Amendment

- Revised label (updated mix charts and directions)

General Comments

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

If you have further questions or comments, you may contact me by telephone at 703.308.6422 or via email at heyward.adam@epa.gov during the hours of 7:00am to 4:00pm EST with a response and for any questions concerning this letter. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Heyward".

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

Enclosure: [stamped label]

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC
ANIMALS**

CAUTION: Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

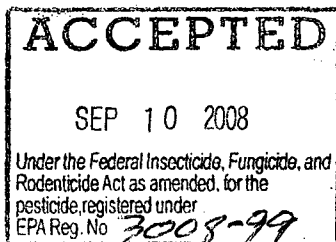
Applicators and other handlers must wear eye protection and rubber gloves.

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. 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 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.



ORD-X400

ANTIMICROBIAL - WOOD PRESERVATIVE

Active Ingredients:

Copper Carbonate*.....48.0 %
Inert Ingredients..... 52.0 %
Total : 100.0 %

This Product Contains Sodium Nitrite.

*Metallic Copper Equivalent: 28%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID	
IF ON SKIN:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a 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.
HOT LINE NUMBER	
In case of emergency, call CHEMTREC toll free at 800-424-9300.	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

SEE LEFT PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS

EPA Registration No. 3008-99
EPA Establishment No. 3008-TN-1
 3008-SC-1

Net Contents: _____

Manufactured by
Osmoste, Inc.
980 Ellicott Street
Buffalo, NY 14209

DIRECTIONS FOR USE

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

Use ORD-X400 to control all types of fungal decay of wood products - brown, white and soft rot and wood eating insects. ORD-X400 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 boards, and posts, building poles and decks, docks, walkways, and wood shingles.

Tank mix ORD-X400 with quaternary ammonium or azole compounds approved for wood treatment. Apply the tank mix solution by pressure impregnation. Follow the mixing instructions mix charts as a guide 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.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL:

Pesticide wastes are toxic. 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.

MIX CHART #1
Mixing Table for ORD-X400 + 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	ORD-X400	Quat	Water
0.30	0.200	0.100	3.47	2.09	994.4
0.35	0.233	0.117	4.05	2.44	993.5
0.40	0.267	0.133	4.63	2.78	992.6
0.45	0.300	0.150	5.21	3.13	991.7
0.50	0.333	0.167	5.79	3.48	990.7
0.55	0.367	0.183	6.37	3.83	989.8
0.60	0.400	0.200	6.95	4.18	988.9
0.65	0.433	0.217	7.53	4.53	987.9
0.70	0.467	0.233	8.11	4.88	987.0
0.75	0.500	0.250	8.69	5.23	986.1
0.80	0.533	0.267	9.28	5.59	985.1
0.85	0.567	0.283	9.86	5.94	984.2
0.90	0.600	0.300	10.45	6.29	983.3
0.95	0.633	0.317	11.03	6.64	982.3
1.00	0.667	0.333	11.61	6.99	981.4
1.10	0.733	0.367	12.79	7.70	979.5
1.20	0.800	0.400	13.96	8.40	977.6
1.30	0.867	0.433	15.13	9.11	975.8
1.40	0.933	0.467	16.31	9.82	973.9
1.50	1.000	0.500	17.49	10.53	972.0
1.60	1.067	0.533	18.66	11.24	970.1
1.70	1.133	0.567	19.85	11.95	968.2
1.80	1.200	0.600	21.03	12.66	966.3
1.90	1.267	0.633	22.21	13.37	964.4
2.00	1.333	0.667	23.40	14.09	962.5
2.10	1.400	0.700	24.59	14.80	960.6
2.20	1.467	0.733	25.78	15.52	958.7
2.30	1.533	0.767	26.97	16.24	956.8
2.40	1.600	0.800	28.16	16.95	954.9
2.50	1.667	0.833	29.36	17.67	953.0
2.60	1.733	0.867	30.55	18.39	951.1
2.70	1.800	0.900	31.75	19.12	949.1
2.80	1.867	0.933	32.95	19.84	947.2
2.90	1.933	0.967	34.15	20.56	945.3
3.00	2.000	1.000	35.36	21.29	943.4
3.10	2.067	1.033	36.56	22.01	941.4
3.20	2.133	1.067	37.77	22.74	939.5
3.30	2.200	1.100	38.98	23.47	937.6
3.40	2.267	1.133	40.19	24.20	935.6
3.50	2.333	1.167	41.41	24.93	933.7
3.60	2.400	1.200	42.62	25.66	931.7
3.70	2.467	1.233	43.84	26.39	929.8
3.80	2.533	1.267	45.05	27.12	927.8
3.90	2.600	1.300	46.27	27.86	925.9

MIX CHART #2
Mixing Table for ORD-X400 + 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	ORD-X400	Quat	Water
0.20%	0.100%	0.100%	1.73	2.08	996.2
0.25%	0.125%	0.125%	2.16	2.61	995.2
0.30%	0.150%	0.150%	2.60	3.13	994.3
0.35%	0.175%	0.175%	3.03	3.65	993.3
0.40%	0.200%	0.200%	3.47	4.17	992.4
0.45%	0.225%	0.225%	3.90	4.70	991.4
0.50%	0.250%	0.250%	4.34	5.22	990.4
0.55%	0.275%	0.275%	4.77	5.74	989.5
0.60%	0.300%	0.300%	5.20	6.27	988.5
0.65%	0.325%	0.325%	5.64	6.79	987.6
0.70%	0.350%	0.350%	6.08	7.32	986.6
0.75%	0.375%	0.375%	6.51	7.84	985.6
0.80%	0.400%	0.400%	6.95	8.36	984.7
0.85%	0.425%	0.425%	7.38	8.89	983.7
0.90%	0.450%	0.450%	7.82	9.42	982.8
0.95%	0.475%	0.475%	8.26	9.94	981.8
1.00%	0.500%	0.500%	8.69	10.47	980.8
1.10%	0.550%	0.550%	9.57	11.52	978.9
1.20%	0.600%	0.600%	10.44	12.57	977.0
1.30%	0.650%	0.650%	11.32	13.63	975.1
1.40%	0.700%	0.700%	12.20	14.68	973.1
1.50%	0.750%	0.750%	13.07	15.74	971.2
1.60%	0.800%	0.800%	13.95	16.80	969.2
1.70%	0.850%	0.850%	14.83	17.86	967.3
1.80%	0.900%	0.900%	15.71	18.92	965.4
1.90%	0.950%	0.950%	16.60	19.98	963.4
2.00%	1.000%	1.000%	17.48	21.04	961.5
2.10%	1.050%	1.050%	18.36	22.11	959.5
2.20%	1.100%	1.100%	19.25	23.17	957.6
2.30%	1.150%	1.150%	20.13	24.24	955.6
2.40%	1.200%	1.200%	21.02	25.31	953.7
2.50%	1.250%	1.250%	21.91	26.38	951.7
2.60%	1.300%	1.300%	22.79	27.45	949.8
2.70%	1.350%	1.350%	23.68	28.52	947.8
2.80%	1.400%	1.400%	24.57	29.59	945.8
2.90%	1.450%	1.450%	25.46	30.66	943.9
3.00%	1.500%	1.500%	26.36	31.74	941.9
3.10%	1.550%	1.550%	27.25	32.81	939.9
3.20%	1.600%	1.600%	28.14	33.89	938.0
3.30%	1.650%	1.650%	29.04	34.96	936.0
3.40%	1.700%	1.700%	29.93	36.04	934.0
3.50%	1.750%	1.750%	30.83	37.12	932.0
3.60%	1.800%	1.800%	31.73	38.20	930.1
3.70%	1.850%	1.850%	32.63	39.29	928.1
3.80%	1.900%	1.900%	33.53	40.37	926.1
3.90%	1.950%	1.950%	34.43	41.45	924.1

MIX CHART #3
Mixing Table for ORD-X400 + Azole Compound (ORD-X300)
 (EPA Reg. No. 3008-XX + 3008-97)

Liquid Strength, % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Liquid Combine following Gallons of		
	Cu	Tebuconazole	ORD-X400	ORD-X300	Water
0.160%	0.154%	0.0062%	3.33	0.170	996.5
0.180%	0.173%	0.0070%	3.75	0.192	996.1
0.200%	0.192%	0.0078%	4.17	0.213	995.6
0.220%	0.211%	0.0086%	4.58	0.235	995.2
0.240%	0.231%	0.0094%	5.00	0.256	994.7
0.260%	0.250%	0.0101%	5.42	0.277	994.3
0.280%	0.269%	0.0109%	5.84	0.299	993.9
0.300%	0.288%	0.0117%	6.26	0.320	993.4
0.320%	0.308%	0.0125%	6.68	0.342	993.0
0.340%	0.327%	0.0133%	7.10	0.363	992.5
0.360%	0.346%	0.0140%	7.52	0.385	992.1
0.380%	0.365%	0.0148%	7.94	0.406	991.7
0.400%	0.384%	0.0156%	8.36	0.428	991.2
0.420%	0.404%	0.0164%	8.78	0.449	990.8
0.440%	0.423%	0.0172%	9.20	0.471	990.3
0.460%	0.442%	0.0179%	9.62	0.492	989.9
0.480%	0.461%	0.0187%	10.04	0.514	989.4
0.500%	0.480%	0.0195%	10.46	0.535	989.0
0.520%	0.500%	0.0203%	10.88	0.557	988.6
0.540%	0.519%	0.0211%	11.30	0.578	988.1
0.560%	0.538%	0.0218%	11.72	0.600	987.7
0.580%	0.557%	0.0226%	12.15	0.622	987.2
0.600%	0.577%	0.0234%	12.57	0.643	986.8
0.620%	0.596%	0.0242%	12.99	0.665	986.3
0.640%	0.615%	0.0250%	13.41	0.686	985.9
0.660%	0.634%	0.0257%	13.84	0.708	985.5
0.680%	0.653%	0.0265%	14.26	0.730	985.0
0.700%	0.673%	0.0273%	14.68	0.751	984.6
0.720%	0.692%	0.0281%	15.11	0.773	984.1
0.740%	0.711%	0.0289%	15.53	0.795	983.7
0.760%	0.730%	0.0296%	15.95	0.817	983.2
0.780%	0.750%	0.0304%	16.38	0.838	982.8
0.800%	0.769%	0.0312%	16.80	0.860	982.3
0.820%	0.788%	0.0320%	17.23	0.882	981.9
0.840%	0.807%	0.0328%	17.65	0.903	981.4
0.860%	0.826%	0.0335%	18.08	0.925	981.0
0.880%	0.846%	0.0343%	18.50	0.947	980.5
0.900%	0.865%	0.0351%	18.93	0.969	980.1
0.920%	0.884%	0.0359%	19.36	0.991	979.7
0.940%	0.903%	0.0367%	19.78	1.012	979.2
0.960%	0.923%	0.0374%	20.21	1.034	978.8
0.980%	0.942%	0.0382%	20.64	1.056	978.3
1.000%	0.961%	0.0390%	21.06	1.078	977.9
1.020%	0.980%	0.0398%	21.49	1.100	977.4
1.040%	0.999%	0.0406%	21.92	1.122	977.0
1.060%	1.019%	0.0413%	22.35	1.144	976.5
1.080%	1.038%	0.0421%	22.77	1.165	976.1
1.100%	1.057%	0.0429%	23.20	1.187	975.6