

3008-108

11/7/2011

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

JAN - 7 2011

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Teri Muchow  
Osmose, Inc.  
1016 Everee Inn Road, P.O.Box O  
Griffin, GA 30224-0249

Subject: Sustain™ 25  
EPA Registration No.: 3008-108  
Application Date: 12/01/2010  
Receipt Date: 12/03/2010

Dear Ms. Teri Muchow:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

**Proposed Amendment**

- Adding additional compounds to be mixed with this product
- Adding a mix chart
- Revision of Container handling statements per PRN 2007-4

**Conditions:**

Revise the label as follows:

1. Environmental Hazards section must be revised to read:

“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. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

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 washwater or rinsate.”

2. Revise the header “User Safety Recommendations” to state “User Safety Requirements” to comply with PRN 2000-6, Mandatory Labeling.

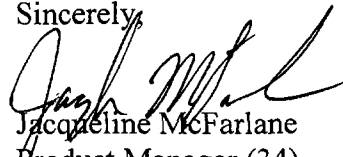
- 3. Add "Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet" to the User Safety Recommendations box.

**General Comments**

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at [carl.jaclyn@epa.gov](mailto:carl.jaclyn@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



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

**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.

**USER SAFETY RECOMMENDATIONS**

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

**Personal Protective Equipment (PPE)**

Mixers, loaders, applicators and other handlers must wear the following:

- Long-sleeved shirt
- Long pants
- Shoes plus socks
- Eye protection such as goggles, face shield, or safety glasses
- Rubber gloves

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. Wash the outside of gloves before removing.

NOTE: Applicators must not eat, drink, or use tobacco products during those parts of the application process where exposure to the wood treatment formulation may occur (e.g., manually operating cylinder doors, handling freshly treated wood, etc.).

**Environmental Hazards**

This product is toxic to fish and aquatic invertebrates and may contaminate water through runoff. Do not contaminate water by cleaning of equipment or disposal of wash waters or rinsate. 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.

Certain water conditions including low pH ( $\leq 6.5$ ), low dissolved organic carbon (DOC) levels (3.0 mg/L or lower), and "soft" waters (i.e. alkalinity less than 50 mg/L), increase the potential acute toxicity to aquatic organisms.

Batch No.: \_\_\_\_\_

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

**ACCEPTED**  
with COMMENTS  
EPA Letter Dated:

**JAN - 7 2011**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticides registered under EPA Reg. No.

**3008108**

**Sustain™ 25**  
**Antimicrobial**

For use as a Wood and Burlap Preservative

**ACTIVE INGREDIENT:**

Copper Carbonate, CAS # 12069-69-1\* .....43.5%

**OTHER INGREDIENTS:\*\*** .....56.5 %

**TOTAL** .....100.0 %

\*METALLIC COPPER EQUIVALENT – 25.0 %  
(\*\* THIS PRODUCT CONTAINS SODIUM NITRITE)

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

<b>FIRST AID</b>	
<b>IF IN EYES</b>	<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 the first five minutes, and then continue rinsing.</li> <li>• Call a Poison Control Center to doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Call a Poison Control Center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not give anything by mouth to an unconscious person.</li> <li>• Do not induce vomiting unless told to do so by a Poison Control Center or doctor.</li> </ul>
<b>IF INHALED</b>	<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>IF ON SKIN OR CLOTHING</b>	<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>
<b>HOT LINE NUMBER</b>	
<p>For medical emergencies involving this product, call toll free 1-888-324-7598. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<b>NOTE TO PHYSICIAN</b>	
<p>"Probable mucosal damage may contraindicate the use of gastric lavage."</p>	

Osmose, Inc.  
980 Ellicott Street  
Buffalo, NY 14209

EPA Reg. No. 3008-108  
EPA Est. No.  3008-TN-001  
 3008-SC-001

3008108

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during use. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

### General Information

Sustain™ 25 is for use to control fungal decay of wood products including lumber, timbers, landscape ties, fence posts, building and utility poles, land, freshwater and marine piling, seawalls, decking and wood shingles. Sustain™ 25 may also be used to treat burlap for agricultural, horticultural, nursery and military uses. Sustain™ 25 is effective against brown, white, and soft rot, and wood eating insects.

### Application Instructions

#### Burlap Treatment

Sustain™ 25 is a copper-based mildewcide specifically formulated to impart fungus resistance on burlap for agricultural, horticultural, and nursery uses. Sustain™ 25 may also be used on burlap in accordance with Military Specification MIL-F-46032A. The operational procedure to obtain a treated product that will pass the product specifications requires the use of a treating tank that is not constructed of or contains any brass or bronze materials. Dilute the concentrated Sustain™ 25 1:5 with water in the treatment tank and immerse the burlap to be treated. Keep the burlap submerged in the tank until the burlap has obtained an analysis of 1.5% to 2.0% metallic copper measured on a dry basis.

#### Wood Treatment

Use Sustain™ 25 to treat any type of wood to be used above ground, in ground, or in water that will be exposed to conditions favorable to rot, decay or insect attack.

Tank mix Sustain™ 25 with quaternary ammonium compounds or ~~azole compounds~~ approved for wood treatment. Apply the tank mix solution by pressure impregnation. Follow the instructions in the Mixing Tables ~~as a guide for obtaining~~ the desired solution concentration. The percent solution to be used should be based on the retention in pounds per cubic foot (PCF) as specified by the purchaser and by the treating process used.

## STORAGE AND DISPOSAL

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

**Pesticide Storage:** Store unused product in original containers only in a cool, well-ventilated location out of the reach of children and animals.

**Pesticide Disposal:** Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide 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 for guidance.

**CONTAINER HANDLING:** ~~Totes: Nonrefillable container. Do not reuse or refill this container. Empty tote container must be returned to a tote collection agent. 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.~~

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**Mixing Table for Sustain™ 25 Wood Preservative and 50% Didecyl Dimethyl Ammonium Carbonate (2-Component System)**

Solution Strength % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Solution Combine Following Gallons of		
	CuO	DDACarbonate	Sustain™ 25	DDACarbonate (50%)	Water
0.60%	0.400%	0.200%	8.2	4.16	987.7
0.65%	0.433%	0.217%	8.8	4.51	986.7
0.70%	0.467%	0.233%	9.5	4.86	985.6
0.75%	0.500%	0.250%	10.2	5.21	984.6
0.80%	0.533%	0.267%	10.9	5.55	983.6
0.85%	0.567%	0.283%	11.6	5.90	982.5
0.90%	0.600%	0.300%	12.3	6.25	981.5
0.95%	0.633%	0.317%	12.9	6.60	980.5
1.00%	0.667%	0.333%	13.6	6.95	979.4
1.10%	0.733%	0.367%	15.0	7.66	977.3
1.20%	0.800%	0.400%	16.4	8.36	975.3
1.30%	0.867%	0.433%	17.8	9.06	973.2
1.40%	0.933%	0.467%	19.1	9.77	971.1
1.50%	1.000%	0.500%	20.5	10.47	969.0
1.60%	1.067%	0.533%	21.9	11.18	966.9
1.70%	1.133%	0.567%	23.3	11.89	964.8
1.80%	1.200%	0.600%	24.7	12.59	962.7
1.90%	1.267%	0.633%	26.1	13.30	960.6
2.00%	1.333%	0.667%	27.5	14.01	958.5
2.10%	1.400%	0.700%	28.9	14.73	956.4
2.20%	1.467%	0.733%	30.3	15.44	954.3
2.30%	1.533%	0.767%	31.7	16.15	952.2
2.40%	1.600%	0.800%	33.1	16.87	950.1
2.50%	1.667%	0.833%	34.5	17.59	947.9
2.60%	1.733%	0.867%	35.9	18.30	945.8
2.70%	1.800%	0.900%	37.3	19.02	943.7
2.80%	1.867%	0.933%	38.7	19.74	941.6
2.90%	1.933%	0.967%	40.1	20.46	939.4
3.00%	2.000%	1.000%	41.5	21.18	937.3
3.10%	2.067%	1.033%	42.9	21.91	935.2
3.20%	2.133%	1.067%	44.4	22.63	933.0
3.30%	2.200%	1.100%	45.8	23.36	930.9
3.40%	2.267%	1.133%	47.2	24.08	928.7
3.50%	2.333%	1.167%	48.6	24.81	926.6
3.60%	2.400%	1.200%	50.1	25.54	924.4
3.70%	2.467%	1.233%	51.5	26.27	922.2
3.80%	2.533%	1.267%	52.9	27.00	920.1
3.90%	2.600%	1.300%	54.4	27.73	917.9

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[The following mix chart is new.]

### Mixing Table for Sustain 25 + Tebuconazole

Liquid Strength, % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Liquid Combine following Gallons of		
	Cu	Tebuconazole	Sustain™ 25	Tebuconazole (33.95%)	Water
0.10	0.096	0.0039	2.49	0.106	997.4
0.15	0.144	0.0059	3.73	0.159	996.1
0.20	0.192	0.0078	4.98	0.213	994.8
0.25	0.240	0.0098	6.23	0.266	993.5
0.30	0.288	0.0117	7.48	0.319	992.2
0.35	0.336	0.0137	8.73	0.373	990.9
0.40	0.384	0.0156	9.98	0.426	989.6
0.45	0.432	0.0176	11.24	0.480	988.3
0.50	0.480	0.0195	12.50	0.534	987.0
0.55	0.529	0.0215	13.76	0.587	985.7
0.60	0.577	0.0234	15.02	0.641	984.3
0.65	0.625	0.0254	16.28	0.695	983.0
0.70	0.673	0.0273	17.54	0.749	981.7
0.75	0.721	0.0293	18.81	0.803	980.4
0.80	0.769	0.0312	20.08	0.857	979.1
0.85	0.817	0.0332	21.35	0.911	977.7
0.90	0.865	0.0351	22.62	0.966	976.4
0.95	0.913	0.0371	23.89	1.020	975.1
1.00	0.961	0.0390	25.17	1.074	973.8
1.05	1.009	0.0410	26.44	1.129	972.4
1.10	1.057	0.0429	27.72	1.184	971.1
1.15	1.105	0.0449	29.00	1.238	969.8
1.20	1.153	0.0468	30.28	1.293	968.4
1.25	1.201	0.0488	31.57	1.348	967.1
1.30	1.249	0.0507	32.85	1.403	965.7
1.35	1.297	0.0527	34.14	1.458	964.4
1.40	1.345	0.0546	35.43	1.513	963.1
1.45	1.393	0.0566	36.72	1.568	961.7
1.50	1.441	0.0585	38.01	1.623	960.4