



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 5, 2025

Leigh Ann Richardson
Senior Manager Regulatory Affairs
Koppers Performance Chemicals
Electronic Transmittal: RichardsonLA@koppers.com

Subject: PRIA Label and CSF Amendment – Revert to original metallic copper equivalent and incorporate Copper IRRD language on label; Updating current CSFs, adding new CSFs and cancelling previously approved CSFs to the Product
Product Name: ORD-X070
EPA Registration Number: 3008-112
Application Date: 08/15/2023
Action Case Number: 00488507

Dear Leigh Ann Richardson:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6), you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 06/04/2024
- Alternate Formulation #2 dated 03/25/2015

- Alternate Formulation #3- #5 dated 06/04/2024
- Alternate Formulation #10- #17 dated 06/04/2024
- Alternate Formulation #22- #29 dated 06/04/2024
- Alternate Formulation #34- #41 dated 06/04/2024
- Alternate Formulation #46- #49 dated 06/04/2024
- Alternate Formulation #50- #97 dated 03/16/2016
- Alternate Formulation #98- #100 dated 06/04/2024
- Alternate Formulation #101 dated 02/14/2025
- Alternate Formulation #106- #108 dated 06/04/2024
- Alternate Formulation #109 dated 02/14/2025
- Alternate Formulation #110- #112 dated 06/04/2024
- Alternate Formulation #113 dated 02/14/2025
- Alternate Formulations #114- #117 dated 11/01/2016
- Alternate Formulations #118- #120 dated 06/05/2024
- Alternate Formulation #121 dated 02/14/2025
- Alternate Formulations #123- #125 dated 06/05/2024
- Alternate Formulation #126 dated 02/14/2025
- Alternate Formulation #127- #129 dated 06/05/2024
- Alternate Formulation #130 dated 02/14/2025
- Alternate Formulation #131- #133 dated 06/05/2024
- Alternate Formulation #134 dated 02/14/2025
- Alternate Formulation #135- #137 dated 06/05/2024
- Alternate Formulation #138 dated 02/14/2025
- Alternate Formulation #139- #141 dated 06/05/2024
- Alternate Formulation #142 dated 02/14/2025
- Alternate Formulation #143- #145 dated 06/05/2024
- Alternate Formulation #146 dated 02/14/2025
- Alternate Formulation #147- #149 dated 06/05/2024
- Alternate Formulation #150 dated 02/14/2025
- Alternate Formulation #151- #153 dated 06/05/2024
- Alternate Formulation #154 dated 02/14/2025
- Alternate Formulations #155- #157 dated 06/06/2024
- Alternate Formulation #158 dated 02/14/2025
- Alternate Formulation #159- #161 dated 06/06/2024
- Alternate Formulation #162 dated 02/14/2025
- Alternate Formulation #163- #165 dated 06/06/2024
- Alternate Formulation #166 dated 02/14/2025
- Alternate Formulation #167- #169 dated 06/06/2024
- Alternate Formulation #170 dated 02/14/2025

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process, FIFRA section 12(a)(1)(B). Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Assurance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Lorena Rivas via email at rivas.lorena@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcel Howard", is positioned above the typed name.

Marcel Howard, Product Manager (34)
Regulatory Management Branch 2
Antimicrobials Division (7510M)
Office of Pesticide Programs

Enclosure: Resubmission Product Chemistry Review dated 10/30/2024

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage or skin burns. May be fatal if absorbed through skin. Harmful if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield. Wear protective clothing and rubber gloves. 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: Coveralls over long-sleeved shirt and long pants, socks and chemical resistant footwear, goggles or face shield, chemical-resistant gloves (such as Barrier Laminate or Viton), and a NIOSH-approved respirator with ammonia, organic, and HEPA cartridge such as P-100 must be worn when PEL threshold levels are exceeded for an 8-hour work period.

USER SAFETY REQUIREMENTS: Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separate from other laundry. Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove personnel protective equipment immediately after handling this product. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic invertebrates. 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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Open dumping is prohibited. Keep container closed when not in use. Store in a dry, well ventilated area.
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 HANDLING:
Drums: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat the procedure two more times. Offer for reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.
Totes: Nonrefillable container. Do not reuse or refill this container. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.
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.
Containers 5 gallons or less: 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. Triple rinse container (or equivalent) promptly after emptying. Triple Rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

ORD-X070
ANTIMICROBIAL – WOOD PRESERVATIVE

ACTIVE INGREDIENTS:
Copper Ethanolamine Complex*
(CAS #14215-52-2)27.00%
Tebuconazole0.19%
Propiconazole0.19%
OTHER INGREDIENTS72.62%
TOTAL.....100.00%

* Metallic Copper Equivalent: 9.25%

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. Decontamination must proceed concurrently with whatever resuscitative and antidotal measures are necessary to preserve life. Wear rubber gloves while washing pesticide from skin and eyes of patient.
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 Reg. No. 3008-112 EPA Est. No. 3008-TN-1

Manufactured by:
Koppers Performance Chemicals Inc.
1016 Everee Inn Rd.
Griffin, GA 30224

NET CONTENTS: _____

BATCH CODE: _____

DIRECTIONS FOR USE

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

This product will control all types of fungal decay of wood products - brown, white, soft, and dry rot and wood destroying insects such as termites and ascomycetes. Apply ORD-X070 by vacuum pressure treatment to impregnate wood products that will be exposed to conditions favorable to rot, decay or insect attack above ground, in ground, or in water. Do not spray.

This product may be used alone or tank mixed with NW-CA 200 (EPA Reg. No. 3008-127, a mixture of alkaline copper ammonia complex and azole compounds) approved by EPA for wood treatment. The treating solution concentration will range from 0.1% to 5.0% total active ingredients by weight. A closed system must be used when preparing the use-solution and for delivery of the use-solution to the treatment vessel.

Used alone: To prepare a 1,000-gallon solution containing 0.8% total actives (0.77% Cu and 0.03% azoles), combine 932.5 gallons of water and 67.5 gallons of ORD-X070. For other treating solution strength scenarios, adjust the ORD-X070 concentration to meet the desired copper/azole levels. Water will make up the difference.

ORD-X070 and NW-CA 200: ORD-X070 and NW-CA 200 can be mixed at any ratio. To prepare a 1,000-gallon solution containing 0.8% total actives (0.77% Cu and 0.03% azoles) with 50% actives from ORD-X070 and 50% actives from NW-CA 200, combine 930.0 gallons of water, 36.3 gallons of NW-CA 200, and 33.7 gallons of NW-CA. For other treating solution strength scenarios, adjust the ORD-X070 and NW-CA 200 concentrations to meet the desired copper/azole levels. Water will make up the difference.

The below charts represent the uses/commodities, maximum application rates, minimum retention in pounds per cubic foot (pcf) of each active ingredient, and minimum total active retention for each use/commodity category.

ORD-X070 with or without NW-CA 200					
Uses/Commodities	Maximum Application Rates		Minimum Active Ingredient Retention		Minimum Total Active Retention (pcf)
	as Cu (%)	Azole (%)	as Cu (pcf)	Azole (pcf)	
Interior/Above Ground Protected/Above Ground Exposed (millwork, siding, walkways, decking, railings, fence pickets, joists, beams)	1.0	0.04	0.0577	0.0023	0.060
Ground Contact General Use (deck posts, fence posts, joists beams for decks and freshwater docks, utility poles, round guardrail posts, crossties)	2.0	0.08	0.144	0.006	0.15
Ground Contact Heavy Duty (utility poles, building poles, permanent wood foundations, saltwater splash zones, crossties)	3.5	0.14	0.298	0.012	0.31
Ground Contact Extreme Duty (utility poles, crossties, piling)	4.8	0.20	0.394	0.016	0.41

