



**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

WASHINGTON, D.C. 20460

August 5, 2025

Leigh Ann Richardson  
Koppers Performance Chemicals, Inc.  
Electronic Transmittal: [richardsonla@koppers.com](mailto:richardsonla@koppers.com)

Subject: Label Amendment – Changes Required by the Naphthenate Salts Amended  
Interim Registration Review Decision  
Product Name: CU-NAP EUP  
EPA Registration Number: 3008-129  
Received Date: 1/6/2025  
Action Code Case Number: 00648859

Dear Leigh Ann Richardson:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is 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.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Naphthenate Salts Amended Interim Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used with your next label printing. 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 12 months from the date of this letter. After 12 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.

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) list 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 Compliance.

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 Megan Snyderman by phone at 202-566-0639, or via email at [Snyderman.Megan@epa.gov](mailto:Snyderman.Megan@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Miederhoff".

Eric Miederhoff  
Chief, Reevaluation Branch  
Antimicrobials Division  
EPA Office of Pesticide Programs

Enclosure: Stamped Label

# CU-NAP EUP

For External Use Only

## ACTIVE INGREDIENT:

Copper naphthenate\* (CAS No. 1338-02-9) ..... 68%

OTHER INGREDIENTS: ..... 32%

TOTAL ..... 100%

\*Equivalent to 8% metallic copper

CONTAINS PETROLEUM DISTILLATES

## KEEP OUT OF REACH OF CHILDREN WARNING

### 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 poison control center or doctor immediately for treatment advice. Do not give any liquid to the person. Do not induce vomiting unless told to do so by the 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 by mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call CHEMTREC toll free at 800-424-9300.

**Note to Physician:** Contains petroleum distillates. Vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.

See side panel for additional precautionary statements.

EPA Reg. No. 3008-129 EPA Est. No. XXXX

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

NET CONTENTS:

- |                                      |   |
|--------------------------------------|---|
| <input type="checkbox"/> 55 Gallons  | <input type="checkbox"/> Bulk Truckload |
| <input type="checkbox"/> 275 Gallons | <input type="checkbox"/> Bulk Railcar   |
| <input type="checkbox"/> 330 Gallons |   |

Batch Number: \_\_\_\_\_

**ACCEPTED**

08/05/2025

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 3008-129

CU-NAP EUP Proposed Label 2025-08

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**WARNING.** Causes skin and eye irritation. Prolonged or repeated skin contact may cause allergic reaction in some individuals. Harmful if swallowed or inhaled. Do not breathe vapors or mist during brush, roll, and dip applications. Do not get in eyes, on skin, or on 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.

Application of this product may produce a strong, lingering, unpleasant odor.

### PERSONAL PROTECTIVE EQUIPMENT (PPE):

- Applicators, mixers, and other handlers must wear chemical resistant gloves, protective eyewear, long-sleeved shirt, long pants, socks and shoes when handling or applying this product.
- When applying this product with a brush/roller, applicant must wear an organic vapor respirator.
- Some materials that are chemical-resistant to this product are barrier laminate; butyl, nitrile, neoprene and natural rubbers  $\geq$  14 mils; polyethylene; polyvinyl chloride; and viton  $\geq$  14 mils.
- Tank clean-up crews in dip diffusion facilities must wear a minimum of a NIOSH approved (TC-84A) air-purifying half-mask elastomeric respirator with any R or P filter.

**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. User 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. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**ENVIRONMENTAL HAZARDS:** This product is toxic to fish, aquatic invertebrates and aquatic plants. 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 OR CHEMICAL HAZARDS: COMBUSTIBLE.** Do not use, pour, spill, or store near heat or open flame. Use only with adequate ventilation.

## DIRECTIONS FOR USE

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

CU-NAP EUP treated wood will be protected from infestation of destroying organisms including subterranean termites, drywood termites, wood destroying beetles, powderpost beetles, carpenter ants and decay fungi. This product may also be used to control and prevent warping, swelling, shrinking, end checking due to its anti-wicking property, which resists moisture absorption and movement from end to end caused by changes in moisture content of wood products, wood rot, mold and mildew, and moss.

Solutions of CU-NAP EUP can be applied to wooden and/or cellulose utility and construction products (including lumber, end cuts, timber, rail ties, bridge ties, posts, poles, freeway fencing, siding, piers, docks, boxes, roofs, shakes, shingles, porches, steps, fences, rails and beverage cases). CU-NAP EUP treated wood is suitable for ornamental or planting landscape timbers/ties, wooden seedling trays, outdoor décor, flower boxes and window boxes. Wood treated with this product must not be used where it will come in contact with food, feed or potable water. Do not use CU-NAP EUP treated wood for garden applications where fruit and or vegetables will be grown.

Wood treated with this product shall not be used in the construction of beehives. The treated wood can be burned, disposed of, or re-purposed after primary service as a railroad tie, post or utility pole for use in residential landscaping or as fence posts.

This product must be diluted with a solvent such as mineral spirits, diesel fuel, mineral oil, or other solvents. Effective application rates vary according to severity of conditions to which the treated product is exposed. When field treating, do so in a manner that the product does not drip into sensitive environments. Whenever possible, apply field treatments prior to assembling the structure over the body of water or sensitive environment.

**APPLICATION PROCEDURES:** Apply CU-NAP EUP by dip, roller, brush, or pressure treatment. Do not apply with an airless sprayer, by fine mist, or by spray. Agitate well before using. Wood must be thoroughly seasoned. Allow at least 1 hour between multiple applications. Make certain all areas are fully treated to get the maximum benefits.

This product will tint the wood. The color will fade over time. If diluted with mineral spirits, the treated wood can be top-coated with paint or stain 24 hours after application. Always test the oil-based paint or stain in an inconspicuous area for color satisfaction.

### DIP, ROLLER OR BRUSH:

**Above ground contact applications:** CU-NAP EUP solutions containing 1% or 2% copper metal are adequate for wood in non-critical applications. Mix a 1:3 to 1:4 dilution of CU-NAP EUP and solvent to obtain 2% copper metal or 1:7 to 1:8 dilution of CU-NAP EUP and solvent to obtain a 1% copper metal solution. Coverage is dependent upon application method and the refractory nature of the wood being treated. One gallon of diluted CU-NAP EUP will cover approximately 100 - 300 sq. ft. of surface area.

**Ground contact applications:** Treat with a solution containing 0.75% - 2.0% copper metal to a retention in the wood of 0.03 - 0.06 copper metal lbs. per cubic foot (pcf).

The application rate for wood treated with this product in a dip tank shall not exceed 25% copper naphthenate, equivalent to approximately 3% copper metal.

**END CUT TREATMENTS:** Apply a dilute solution of CU-NAP EUP containing 1% to 2% copper metal to cuts, holes or injuries by dip, brush, or roller.

**FOR PRESSURE TREATMENT:** Vacuum pressure treat with a solution containing 0.6% - 3.0% copper metal to a retention in the wood of 0.03 - 0.15 copper metal pcf.

**REMEDIAL APPLICATIONS:** A diluted solution of CU-NAP EUP containing 1% - 2% copper metal may be used for remedial treatment of standing wood poles, piling and other existing structures.

## STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store at temperature between 0°F and 120°F. If the product has been spilled or is leaking, remove the source of the spill or leak. Recover free liquid. Spread absorbant, then pick up and place in containers. Then, where applicable, wash area with detergent and water. Store product in the original container only. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Wastes resulting from use of this product must be disposed of according to state and local regulations.

**CONTAINER HANDLING:** Nonrefillable container; do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty the 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 solvent 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 reconditioning, if appropriate; or puncture and dispose of in a sanitary landfill; or by incineration.