



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 6, 2019

Patti Golick
Registration Specialist
Troy Corporation
8 Vreeland Rd.
PO Box 955
Florham Park, NJ 07932

Subject: Label Amendment – Label revisions at the request of California Department of Pesticide Regulation to allow for state registration.
Product Name: Troysan DOT
EPA Registration Number: 5383-204
Application Date: August 10, 2018
Resubmission Date: June 14, 2019
Decision Number: 543634

Dear Ms. Golick:

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

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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.

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 the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. 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. 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.

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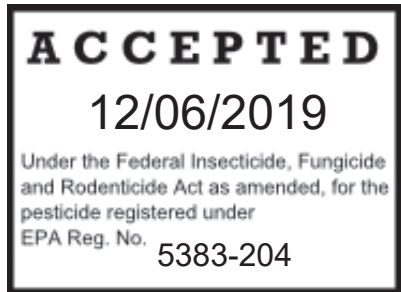
Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Jennifer Gaines by phone at (703) 305-5967, or via email at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is written in a cursive style with some loops and flourishes.

Elizabeth Fertich
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure



Troysan DOT

For Brush, Spray, Pressure Treatment and Dip-Diffusion

Active Ingredient:

Disodium Octaborate Tetrahydrate (Na ₂ B ₈ O ₁₃ .4H ₂ O)	98%
[Boric Oxide (B ₂ O ₃) equivalent 67%]	
INERT INGREDIENTS	2%
TOTAL	100%

EPA Reg. No.: 5383-204
EPA Estab. No.: 5383-NJ-001

READ THE LABEL BEFORE USE

KEEP OUT OF REACH OF CHILDREN

CAUTION

NOT FOR USE IN FOOD OR DRUGS

Manufactured for:

Troy Chemical Corp.
One Avenue L
Newark, N.J. 07105

Emergency Number:
Chemtrec: 1-800-262-8200

NET CONTENTS: _____

[center panel]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food and feed. Do not leave container where children or animals may gain access.

PERSONAL PROTECTION EQUIPMENT

Applicators and other handlers must wear a long-sleeved shirt and long pants which cover the entire arm and leg skin surface, socks, water resistant boots, chemical resistant gloves, and chemical resistant protective eyewear - splash goggles are recommended. When applying this product in confined spaces such as crawl spaces and attics, a ventilation exhaust system is required. If this is impractical, the use of a NIOSH approved respirator designed for dusts/mists is required. Clean spills and over-spray with a clean damp cloth or use an absorbent. Dispose of spill as required by state guidelines and laws.

FIRST AID	
If Swallowed:	<ul style="list-style-type: none"> • Call a doctor or poison control center immediately for treatment advice. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Have person sip a glass of water if able to swallow. • Do not give anything by mouth to an unconscious person.
If in Eyes:	<ul style="list-style-type: none"> • Hold eyes 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:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin with plenty of water for 15-20 minutes • Call poison control center or doctor for additional treatment advice.
If Inhaled	<ul style="list-style-type: none"> • 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 advice.
In case of any medical emergency call 911. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

For use by Individuals/Firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualification of persons using this product.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not contaminate water when cleaning equipment or disposing of equipment wash waters and 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark.

PHYSICAL OR CHEMICAL HAZARDS

Troysan DOT is stable at room temperature in closed containers under normal storage conditions. When heated it loses water and forms Boric Oxide and Sodium Oxide. Avoid high temperatures (> 250°F), dust generation and exposure to moist air or water.

Reaction with strong reducing agents will generate hydrogen gas, which could create an explosion hazard.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dry area. Do not store where children or animals may gain access.

Pesticide Disposal: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Non-refillable container. Do not reuse or refill this container.

Completely empty bag into application equipment. 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.

WARRANTY NOTICE

Neither manufacturer nor the seller shall be liable in respect to any injury or damage suffered by reason of the use of this product for a purpose not indicated by the label or when used contrary to the directions or instructions hereon nor with respect to breach of any warranty not expressly specified herein. To the extent permissible by law, the buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all applicable directions and precautions on this label before using:

Restrictions:

- Do not apply to foamboard.
 - Do not use in edible product areas of food processing plants or on counter tops and other surfaces where food is prepared.
 - Do not use in serving areas where food is exposed.
 - Do not contaminate feed, water or food
 - Do not use to treat lumber that will contact soil or be exposed to leaching by weather.
 - Do not apply directly to food
 - Do not allow children and pets in the treatment area until after application is completed.
- Do not treat pets with this product. Do not contaminate feed and foodstuff. Do not contaminate ornamental plants.

PRODUCT INFORMATION:

Troysan DOT is a water-soluble inorganic borate salt with termiticidal properties. It is effective for the protection and remedial treatment of wood against wood-destroying organisms, including the target pests listed. This product can be used for the pressure treatment of lumber, for the dip-diffusion treatment of lumber, spray and brush applications of lumber with Troysan DOT.

Troysan DOT will penetrate the wood to the heartwood, protecting the wood from termites and other wood destroying insects. It may be tank-mixed with an approved pesticide or an approved fungicide/moldicide for increased performance in insect protection or fungus/mold protection on hard surfaces. Troysan DOT will protect wood from both white rot and brown rot and other fungi. Tank mixing with other fungicides or pesticides must follow any label instructions and precautions.

See accompanying product information sheet for additional rates and directions for use.



Product Information Sheet

TROYSAN DOT, EPA Reg. No. 5383-204

This document must accompany each shipment of TROYSAN DOT.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all applicable directions and precautions on this label before using.

PRECAUTIONS:

- In the home, remove or cover exposed food, food handling surfaces, and cooking utensils. Wash thoroughly after treatment and before reuse.
- When spraying overhead interior areas of homes, apartments buildings, and all other dwellings, cover or protect all surfaces below the area being treated with plastic sheeting or other material which can be disposed of if contamination from dripping or splashing occurs.

TARGET ORGANISMS:

Troysan DOT is effective for treatment of wood (and wood-foam composite structural components) against wood boring insects, including the following insects:

Subterranean Termites

Reticulitermes, *Heterotermes*,
Coptotermes (Formosan)

Dampwood Termites

Zootermopsis

Drywood Termites

Ants: Red Fire, Pharaoh, Argentine,
Carpenter Ants (*Camponotus*)

German Cockroaches

Silverfish

Powderpost Beetles

Lyctidae, *Anobiids*
Bostrichidae, *Cerambycidae*

Wood Decay Fungi

Brown Rot (*Geophyllum trabea*)
White Rot (*Trametes versicolor*)
other wood rot fungi



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This label is for End-Use Applications Only

Wood

Troysan DOT is recommended for wood materials in accordance with the specific treatment methods described below. It is effective for interior and exterior wood (and wood-foam composite structural components) that will be protected from rain and not in direct contact with soil. Types of wood include, but are not limited to, all types of lumber, logs, plywood and wood products. This product is toxic to wood-destroying insects, but surface etching of treated wood may occur.

PRESSURE TREATMENT:

Softwood species use a low concentration solution for Pressure Treatment processes. A 1-2% concentration is very common. For 1000 gallons of 2% concentration, 174 lbs. of Troysan DOT would be dissolved. Wood Pressure treaters can adjust the solution strength to fit the variables of the operating cycle. Vacuum (inches of Mercury), time of vacuum, pressure (psi), time of pressure can vary to achieve the proper loading of the DOT (Disodium Octaborate Tetrahydrate) in any species of wood based on experience.

Pressure treatment of wood must result in retention of 0.17 lbs/ft³ (2.8 kg/m³) B₂Q or 0.26 lbs/ft³ (4.2 kg/m³) DOT for Non-Formosan Termites in the assay zone specified in American Wood Preservation Association (AWPA) Standard T1-10. For Formosan termites, the retentions must be 0.28 lbs/ft³ (4.5 kg/m³) B₂Q or 0.42 lbs/ft³ (6.7 kg/m³) for DOT per the AWPA standard U1-10. The concentration of the solution must be adjusted to give the correct retention for the wood species and size of the lumber being treated; in general solutions are in the range of 1-2% DOT (0.083-0.166 lb/gal w/v) for softwood species.

Dimensional lumber dried to less than 25% moisture (as oven dry weight), should be stickered before treating. If different species are being treated at once, the treatment conditions for the most difficult to treat species must be chosen. If both sapwood and heartwood are included, use the conditions for heartwood to ensure adequate loadings.

Cross Tie Applications:

Troysan DOT can be used on hardwood lumber (e.g Railroad crossties and switchties) under AWPA Book of Standards, 2010, (use Category U1-10, Section 3, Commodity Specifications for Treated Wood End Uses). The borate treated wood must also be post treated with an oil borne preservative for encapsulation purposes. The finished wood product can be rated as a 4C Category Use per the AWPA Book of Standards.



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Hardwood species will require 20% solutions and the use of elevated temperatures (150-180°F). AWPA Book of Standards, Section T1-10, Section A lists the regulated operating conditions for a Pressure Treatment cycle. One gallon of 20% Troysan DOT solution is made by diluting 1.86 lbs. of Troysan DOT with 7.45 lbs. of hot water with good agitation and heat. Maintain heat and mixing to avoid crystallization of the Troysan DOT.

Hardwood railroad ties can be pressure treated with a 20% Troysan DOT solution to the point of refusal (approximately 0.6 gal/tie) to give a loading of 0.27 lbs/ft³ of DOT (1 lb. of DOT /7"x9"x 8.5' tie).

End Cut Treatment:

Certain pressure treated lumber (Western softwoods) should be treated when cut at a construction site because typical wood preservatives do not penetrate some wood species effectively. Spray, brush or dip the end-cuts over a plastic drop cloth to collect any runoff. Spray or brush generously until the wood will accept no more solution. Alternatively, dip each end-cut for about 5 minutes.

DIP-DIFFUSION TREATMENT:

Preparation of Solutions: To prepare a Dip-Diffusion treatment solution, from the table listed below, add water (about 75% of the volume of solution required) to a mixing tank. The temperature is then raised to the required level and the required amount of Troysan DOT is then added to obtain the final volume. The solution is to be agitated for an additional 10 minutes to insure that all of the Troysan DOT has dissolved. The temperature of the solution must be maintained to prevent crystallization losses upon cooling. If crystals are noted they will re-dissolve when the solution is re-heated. In very cold weather, heating and insulation should be used to maintain temperatures. The tank should be covered when not in use to prevent contamination and losses of water by evaporation.

Approximate Conditions and Solution Strengths for the Dip-Diffusion Method

Pounds of Troysan DOT per Gallon of Water	DOT Solution Concentration %	Minimum Solution Temperature
1.6	16.5	105°F (40°C)
1.9	20.5	120°F (50°C)
2.4	25	130°F (55°C)
2.8	29	140°F (60°C)

Different species of wood will require different solution concentrations and the more difficult species may require a second dipping cycle. Lumber used in this process needs to conform to AWPA standards U1-10 and T1-10.



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DIP-DIFFUSION METHOD OF APPLICATION:

Dip freshly cut lumber (moisture content 30-80% water) into the dip-diffusion tank containing the hot aqueous solution of Troysan DOT for 2-15 minutes. The treated wood should be stacked and stored under a tarpaulin or shed roof in order to slow the drying process and prevent leaching of the Troysan DOT by rainfall. Diffusion of the Troysan DOT throughout the wood will start immediately. Storage conditions will influence the speed of the diffusion process. The species and thickness of wood itself will also influence the diffusion process. The species and thickness of wood itself will also influence the diffusion process. Dip-diffusion of lumber must result in a retention of 0.28 lbs/ft³ (4.5 kg/m³) B₂Q for Formosan termite protection. The final loading of active ingredient must conform with AWWA specifications U1-10 and T1-10.

Dip diffusion immersion times and solution concentrations will vary according to the specie of wood treated. Longer dip time, higher concentrations and higher temperatures increase the loading of the Troysan DOT. Finished goods should conform with AWWA Standards: 0.17 lbs/ft³ (2.8 kg/m³) B₃Q or 0.26 lbs/ft³ DOT (4.2 kg/m³) against Non-Formosan termites. Formosan termites require 0.28 lbs/ft³ B₂Q (4.5 kg/m³) or 0.42 lbs/ft³DOT (6.7 kg/m³ DOT)

BRUSH AND SPRAY APPLICATIONS:

Lumber treated by brush and spray applications shall conform with all AWWA Standards. The moisture content of the wood to be treated should be a minimum of 17%. Higher initial moisture content will facilitate the loading of Troysan DOT. For control of termites, Carpenter ants, and wood decay fungi, apply the 15% aqueous solution of Troysan DOT by brush or spray until the surface is thoroughly wet (1 gallon per 200 square feet). For adequate loading of the active ingredient per AWWA specifications, treatment must be conducted a second time (or even a third time for Dampwood or Formosan termites) after the surface has dried. A single coat of 15% Troysan DOT solution at 200 ft²/gallon, will give 0.15 lbs/ft³ (pcf., pounds/cubic foot) of the active ingredient (DOT) to a 0.6 inch depth of the sprayed surface.

Moldicides with Troysan DOT Solutions:

For increased wood protection an EPA registered moldicide may be added to pressure treatment solutions, dip-diffusion solutions, spray solutions and brush solutions. The Troysan DOT will protect the interior of the wood from insects and wood rot and the moldicide will protect the exterior of the wood from mold, mildew and algae.

Wood treated with a moldicide and Troysan DOT can be used in new construction or on wood in existing structures.