

6836-213

6-22-2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 22 2001

Lonza Inc.
17-17 Route 208
Fair Lawn, NJ 07410

ATTENTION: Wendy McCombie, Lewis & Harrison
Agent for Lonza

SUBJECT: Bardac Wood Preservative Concentrate 50
EPA Registration Number: 6836-213
Your Amendment Dated: September 11, 2000
EPA Received Date: September 14, 2000

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3 (c) (7) (A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec 3 (c) (5) when the Agency requires all registrant of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

A. The submitted Data Matrix cites chemistry data performed on an 80% product. This data cannot be used to support a 50% product. Although, since this product is already registered, we will not require new chemistry data at this time. This data will be required at reregistration.

B. Based on your method of support for the Acute Toxicity data requirements revise the first section of the "Precautionary Statements" to read exactly as follows:

"Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin or clothing.

Wear goggles or face shield, protective clothing and impervious gloves. Do not breathe dust, vapor or spray mist. Wash thoroughly with soap and water after handling and before eating.

SYMBOL	drinking or using tobacco					
SURNAME						
DATE						

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You may retain the other three sections listed under the heading "Precautionary Statements."

C. Revise the "Statement of Practical Treatment" to read as follows as per PR Notice 2001-1:

"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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment."

You may retain your "Note to Physician."

D. Revise the first paragraph in the left column on page two to state: "...will protect treated wood articles from the destructive attack of fungi, mold, mildew and both Reticulitermes and Formosan species of termites. Treatment can be *done* by pressure, double vacuum and/or dip methods, *although dip treatment can not be used for protection against termites*. Wood articles..."

E. Revise the directions for use by making the following revisions:

1. Revise section # 2 to include "...to give a solution of the desired concentration of components *following the use directions of each label*."
2. Revise section # 4 by deleting the reference to "Woodtreat-10, EPA Reg. No. 60061-102" since the Woodtreat-10 label states "Use this product ONLY in combination with Kop-Coat's sapstain control products." Thus Woodtreat-10 has a prohibition regarding use with a BARDAC product. Also correct this section by revising the Reg. No. for Safetray P which is 43813-15 not 43815-15.

CONCURRENCES

SYMBOL	F. Revise the directions for double vacuum treatment as follows. The statement						
SURNAME							
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beginning "Allow the pressure to return to atmospheric..." is incorrectly listed twice and must be deleted in the first instance.

G. The submitted efficacy data supports the use of this product for treated wood for above ground application when applied at a minimum rate of 6.0 kg/m³ against Reticulitermes and Formosan species of termites. Revise your label to list this rate in lb./ft³: "For protection against termites, wood must be treated to a minimum of 0.38 lb./ft³." A copy of this review has been enclosed.

H. Revise the "Storage and Disposal" statements to begin as follows:

"Storage and Disposal

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

Pesticide Storage: Do not store on side. Avoid creasing or impacting of side walls."

The remainder of this section is acceptable.

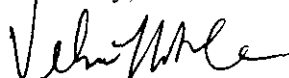
3. Based on the available data in our files for the active ingredient in this product, it appears that this product should be classified in toxicity category II for the inhalation route of exposure. As you are aware, Toxicity category II for inhalation requires a respirator label statement. Although we are not requiring a respirator statement at this time for this product, at some point in the future you will have to address this situation. Our records show you have not submitted an inhalation study for this product. If one is not available you should consider conducting such a study.

4. Submit two (2) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, this registration will be subject to cancellation in accordance with FIFRA sec. 6 (e). Your release for shipment of this product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble

Product Manager (31)

Regulatory Management Branch I

Antimicrobials Division (7510C)

Enclosure (Stamped Label and review of MRDL# 452084-01)				CONCURRENCES			
SYMBOL	510C:T.L.Lantz:6/8/01:6836-213						
SURNAME							
DATE							

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes severe eye and skin damage. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and impervious gloves. Wash thoroughly with soap and water after handling and before eating, drinking and using tobacco. Avoid contamination of food.

Individuals who enter pressure treatment cylinders and other related equipment that are contaminated with the wood treatment solution (e.g. cylinders that are in operation or are not free of the treatment solution) must wear protective clothing including overalls, jacket, gloves and boots impervious to the wood treatment formulation. Federal, state and local confined space entry procedures must be followed.

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, mixing chemicals, handling freshly treated wood).

Discard clothing and other absorbent materials that have been drenched or heavily contaminated. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining protective equipment. If no such instructions exist for washables, use detergent and hot water. Keep and wash protective equipment separate from other laundry.

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 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 AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

**BARDAC WOOD PRESERVATIVE
CONCENTRATE 50**

Active Ingredients:

Didecyl dimethyl ammonium chlorido 50.0%

Inert Ingredients:

TOTAL: 50.0%
100.0%

Contains 7.7 lbs. of product per gallon

**KEEP OUT OF REACH OF CHILDREN
DANGER**

STATEMENT OF PRACTICAL TREATMENT

If In Eyes Or On Skin: Flush with plenty of water for at least 15 minutes. (Eyelids must be held open.) Call a physician immediately.

If Swallowed: Immediately give 3-4 glasses of milk; if unavailable, give water. Do not induce vomiting. Call a physician

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed.

**SEE LEFT PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS**

EPA Registration No. 6836-213
EPA Establishment No. 6836-IL-1
Net Contents

Manufactured by
LONZA, Inc. 17-17 Route 208, Fair Lawn, NJ 07401

ACCEPTED
*** with COMMENTS**
in EPA Letter Dated:

JUN 22 2001

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

6836-213

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BARDAC WOOD PRESERVATIVE 50 is a concentrated biocide use as a wood preservative. When used as directed, BARDAC WOOD PRESERVATIVE 50 will protect treated wood articles from the destructive attack of fungi, mold, mildew ~~and other wood destroying organisms~~. Treatment can be done by pressure, double vacuum and/or dip methods. Wood articles that will be protected by these treatments would include millwork, construction timbers, decking, wood shingles, posts and other articles to be used in above ground applications.

DIRECTIONS FOR USE

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

BARDAC WOOD PRESERVATIVE 50 can be used alone or in combination with other EPA-registered organic and inorganic wood preservatives.

- 1) **BARDAC WOOD PRESERVATIVE 50:**
Dilute BARDAC WOOD PRESERVATIVE 50 in either water or mineral spirits to produce a 0.5% to 3.0% active quaternary ammonium compound (DDAC) solution.
- 2) **BARDAC WOOD PRESERVATIVE 50 and Borates:**
Mix BARDAC WOOD PRESERVATIVE 50 and TIM-BOR, EPA Reg. No. 1624-39, in water and stir to give a solution of the desired concentration of components.
- 3) **BARDAC WOOD PRESERVATIVE 50 and Copper Compounds:**
Mix BARDAC WOOD PRESERVATIVE 50 with water and either ACQ-C2, EPA Reg. No. 10465-36 or ACQ-C, EPA Reg. No. 10465-33. Refer to the product labels for ACQ-C and ACQ-C2 for precise mixing instructions.
- 4) **BARDAC WOOD PRESERVATIVE 50 and Propiconazole:**
Mix BARDAC WOOD PRESERVATIVE 50 and either ~~Propiconazole~~ or Safetray P, EPA Reg. No. 43815-15 and dilute with either water, mineral spirits or other light organic solvent to produce a 0.5 – 3.0% quaternary ammonium compound (DDAC) solution. Follow the instructions on the ~~Propiconazole~~ or Safetray P label for the appropriate concentration of propiconazole PLEASE NOTE THAT THIS FORMULATION CAN ONLY BE USED FOR DIP TREATMENT.

PRESSURE TREATMENT:

Place the wood article to be treated into the pressure cylinder and seal unit. Treat the wooden articles using the pressure treatment procedures consistent with the equipment being used and standard treatment practices. Treatment conditions should be as such as to produce a 0.1 to 0.6 lb./ft³ retention DDAC in the treated article. ~~Such treated wood is to be used for above ground uses only.~~ Such treated wood is to be used for above ground uses only.

DOUBLE VACUUM:

Stack the wood articles to be treated in the treatment vessels so that the preservative solution will have access to all sides of the articles. Seal the vessel. Reduce the pressure within the vessel to -10 inches for five minutes. Cover all the articles with preservative solution. Allow the pressure to return to atmospheric conditions and remove treated wooden articles. Reduce the pressure to -20 inches and maintain for 20 minutes. Allow pressure to return to atmospheric and remove treated wooden articles. Treatment conditions should be such as to produce a 0.1 to 0.6 lb./ft³ retention of DDAC in the treated article. ~~Per product label instructions, wood must be dried to a minimum of 19% moisture content.~~ Wood treated to this retention is suitable for above-ground use only.

DIP TREATMENT:

Stack the wood to be treated on a suitable holder and convey the stack into the treating solution making sure that the stack is completely immersed. Dip times should range from 30 seconds (individual pieces) up to 30 minutes (bundled wooden articles). Use a concentration of 0.5 – 3.0% active quaternary compound (DDAC); the concentration should be customized to the degree of sapstain protection desired, which should be determined by an independent test on the intended species of wood. ~~Per product label instructions, wood must be dried to a minimum of 19% moisture content.~~

STORAGE AND DISPOSAL

- Do not contaminate water, food or feed by storage or disposal.
- Do not store on side.
- Avoid creasing or impacting of side walls.

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 DISPOSAL

Plastic Container:

Triple rinse (or equivalent). Then offer for recycling or reconditioning, 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, puncture and dispose of in a sanitary landfill, or by other procedures approved state and local authorities.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 22 2001

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 6836-213