

MAY 12 1992

Laura J. Sydro
Mooney Chemicals, Inc.
2301 Scranton Road
Cleveland, OH 44113

Dear Ms. Sydro:

Subject: Revised Labeling
M-Gard S120
EPA Registration No 9630-5
Your Submission Dated April 17, 1992

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

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

a. Since this product is for manufacturing use update the Environmental Hazards Section to read:

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Reinstate: "This product is toxic to fish" in this section.

b. On the front panel you should delete the first of the duplicated Signal Words: "WARNING".

c. Move "Contains Petroleum Distillates" to below the ingredient statement, as a substatement.

d. Move "It is a violation of federal law to use this product in a manner inconsistent with its labeling" to below the heading DIRECTIONS FOR USE.

e. To the front panel add the referral statement: See side Panel for Additional Precautionary Statements.

f. Add a statement that each formulator is responsible for obtaining EPA registration for his end use product(s).

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Please note that we did not review the labeling for the additional brand name since the label text must be identical to the basic registration except for the brand name.

Sincerely yours,

Cynthia Giles-Parker

Cynthia Giles-Parker
Product Manger (22)
Fungicide Herbicide Branch
Registration Division (H7505C)

Enclosure

ACCEPTED
with COMMENTS
In EPA Letter Dated:

5-12-92

Federal Insecticide
and Rodenticide Act
for the pesticide
under EPA Reg. No.

9630-5



704

CONTROL
NET
TARE
GROSS

P.O. #



GARD S120 WOOD PRESERVATIVE

PRECAUTIONARY STATEMENTS
WARNING

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:
Causes substantial but temporary eye injury and skin irritation. Harmful if swallowed or absorbed through skin. Do not get in eyes, skin, or clothing. Wear goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Prolonged or repeated skin contact may cause allergic reactions in some individuals.

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

PHYSICAL OR CHEMICAL HAZARDS:
Apply this product only as specified on the label.
Do not use, pour, spill or store near heat or open flame. Use only with adequate ventilation. Close container after each use.

STORAGE AND DISPOSAL:
PROHIBITIONS:
Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL:
Pesticide, spray mixture or residue that cannot be used or chemically reprocessed should be disposed of according to procedures approved by federal, state or local disposal authorities.

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

GENERAL:
Consult federal, state or local disposal authorities for approved alternative procedures.

ACTIVE INGREDIENT:
Copper Naphthenate 77.00%
(Copper, as metal, 3%)

INERT INGREDIENTS 23.00%

TOTAL 100.00%

PRODUCT WT/GAL = 9.3 LBS.

DIRECTIONS

Detailed information on chemical and physical recommendations for M-GARD S120 are available from M-GARD Chemicals, Inc. Labeling for products for which this product must conform to that which is currently in use by the Environmental Protection Agency. Any use of this product must conform to the labeling for products containing M-GARD and registered by the formulator.

FOR USE ONLY IN THE MANUFACTURING OF OTHER FUNGICIDES.

WARNING

CONTAINS PETROLEUM DISTILLATES.
HARMFUL IF SWALLOWED

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

EPA Reg. No. 9630-5
EPA Est. No. 9630-PA-01

KEEP OUT OF REACH OF CHILDREN
WARNING

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyes open and flush with steady gentle stream of water for 15 minutes.

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin mixture, or, if these are not available, large quantities of water. Avoid alcohol. Do not induce vomiting as it may cause respiratory pneumonia.

IF ON SKIN: Wash with plenty of soap and water. GET MEDICAL ATTENTION.

HEALTH 1

FLAMMABILITY 2

REACTIVITY 0

PERSONAL PROTECTION B



Duplicates of statement furnished to...