



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 13, 2003

Ms. Laura J. Sydro
Manager, EH&S
OMG Americas, Inc.
2301 Scranton Road
Cleveland, OH 44113

Subject: **M-Gard S520**
EPA Registration No. 9630-12
Application dated May 19, 2003

Dear Ms. Sydro:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comments:

Proposed Amendment

- revised label per PR Notice 2001-1

Label Comment

1. Remove "PROHIBITIONS" and revise the Pesticide Storage and Disposal text label to read as follows:

<p style="text-align: center;">STORAGE AND DISPOSAL</p> <p style="text-align: center;">Do not contaminate water, food or feed by storage or disposal.</p> <p>"PESTICIDE STORAGE: Add storage text here.</p> <p>"PESTICIDE DISPOSAL. : Add storage text here.</p> <p>"CONTAINER DISPOSAL: Add storage text here.</p>
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- 2. Revise the precautionary statement to read as follows:

**PRECAUTIONARY STATEMENT
HAZARD TO HUMAN AND DOMESTIC ANIMALS**

WARNING: Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist during brush, roll, spray and dip application. Wear goggles or face shield (safety glasses). Wear protective clothing (long-sleeve shirt and long pants, socks plus shoes and chemical resistant gloves such as water proof gloves). Wear a NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of this product. Prolonged or repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.


Other Comment

Note that "M-GARD S522" is an additional brand name. It is the Agency's policy not to review additional brand name labeling.

Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling. A stamped copy is enclosed for your records.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,


 Adam Heyward
 Product Manager (34)
 Regulatory Management Branch II
 Antimicrobials Division (7510C)

Enclosure

M-GARD S520

WOOD PRESERVATIVE

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Harmful if swallowed. Do not exceed specified application rate. Use only the application method specified for a particular use.

Do not get on skin, or on clothing. Prolonged or repeated skin contact may cause allergic reaction in some individuals. Wear long sleeved shirt, long pants, and hand protection such as rubber, or chemical resistant gloves.

Do not breathe vapors or mist during brush, roll, spray and dip applications. Wear a NIOSH/MHSA-approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of this product.

In case of medical questions, emergencies, or accidents involving this product, call 1-800-390-4444.

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

ENVIRONMENTAL HAZARDS EFFLUENT DISCHARGE STATEMENT

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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 use.

STORAGE AND DISPOSAL

STORAGE: Store at temperatures between 0 F and 100F. If 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 original container only. Keep container closed when not in use.

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

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

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



OMG AMERICAS, INC.
TWO MILE RUN ROAD
FRANKLIN, PA 16323
VENANGO COUNTY
814-432-2125

OMG CODE: 00705

LOT NUMBER:

DIRECTIONS FOR USE

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

FOR EXTERIOR USE ONLY

WOOD PRESERVATIVE: For the control of fungal rot and decay, mold and mildew, moss, termites, (including Formosan termites) and other wood destroying insects in wood products including poles, lumber, timbers, fencing, ties, posts and pilings, foundation sills, docks, boats, utility poles, structural timbers, mine timbers, bridge timbers, landscape timbers, cross-ties and stakes. Do not use for wood intended for: direct contact with food or food crops; prolonged exposure to livestock such as pens, stalls, and feeding troughs; and containers designated for the storage of potable water. Wood exposed in or over aquatic environments such as boats, docks, and bridge timbers shall be treated prior to installation in or over the aquatic environment to assure the liquid preservative is not allowed to enter the water. M-GARD S520 may be used to provide protection for wood in contact with soil.

WOOD PREPARATION: Wood should be clean, dry, well seasoned, and free of bark. Do not apply M-GARD S520 over painted or varnished surfaces. Do not apply over bark. Application of M-GARD S520 to wood which has been previously treated with a coating such as paint or varnish will provide limited or no penetration and protection.

TREATING SOLUTIONS: M-GARD S520 should be diluted before application to wood, usually in a hydrocarbon or petroleum solvent. M-GARD S520 is completely soluble in all hydrocarbon solvents, such as naphtha, mineral spirits, Kerosene, and fuel oils. The mixture of solvent and M-GARD S520 should be agitated before use to provide a homogenous solution.

DIP, BRUSH AND ROLL APPLICATIONS: For dipping applications, soak the wood products for a minimum of one minute. The rate of coverage for brushing, rolling and dipping is typically one gallon per 100-300 sq. ft. A 13% to 25% by weight solution of M-GARD S520 in the solvent should be used. NOTE: A 13% solution is 6.7 parts of solvent per part of M-GARD S520, and a 25% solution is three parts of solvent per part of M-GARD S520.

SPRAY APPLICATIONS: The rate of coverage for spraying is typically one gallon per 100-300 sq. ft. A 13% to 25% by weight solution of M-GARD S520 in the solvent should be used. NOTE: A 13% solution is 6.7 parts of solvent per part of M-GARD S520, and a 25% solution is three parts of solvent per part of M-GARD S520.

VACUUM, PRESSURE AND THERMAL APPLICATIONS: Maximum wood treatment and preservation are achieved by full pressure treatment to obtain a minimum average copper retention in the wood of 0.04 pcf for above ground exposure and 0.06 pcf for soil contact. Vacuum, pressure and thermal applications of M-GARD S520 should normally meet treatment rates and retention standards for copper naphthenate specified by the American Wood Preservers Association (AWPA) or other applicable standards or specifications. Typically, for pressure treatments, a 6% to 13% by weight solution of M-GARD S520 in the solvent should be used. A 6% solution is made by mixing 15.7 parts of solvent per part of M-GARD S520. A 13% solution is 6.7 parts of solvent per part of M-GARD S520.

For general information or comments about this product, call **ACCEPTED** **with COMMENTS** **OMG AMERICAS, INC.** at 1-814-432-2125.

EPA Letter Dated:

Ship To:

AUG 13 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 9630-12

INGREDIENTS:

ACTIVE INGREDIENT:
Copper Naphthenate.....80.0%
(Copper, as metal, 8%)
INERT INGREDIENTS:.....20.0%
TOTAL.....100.0%

CONTAINS PETROLEUM DISTILLATES

PRODUCT WT/GAL. 8.3 LBS.

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 SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

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 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 also contact 1-800-390-4444 for emergency medical treatment information.

NOTE TO PHYSICIAN

Contains petroleum distillate - vomiting may cause aspiration pneumonia.

EPA Reg. No. 9630-12
EPA Est. No. 9630-PA-01

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