

JUN 24 1991

Ms. Dabora E. Baker
Chemical Specialist, Inc.
One Woodlawn Green
Charlotte, NC 28217

Dear Ms. Baker:

Subject: Amended Labeling
IMPEL® Rods
EPA Registration No. 10356-16
Your Application for Pesticide Amendment Dated April 12, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The Storage and Disposal Statement must appear at the beginning or end of the Directions for Use, either immediately before the specific directions for use or at the end of the section.
2. The EPA Establishment and Registration Numbers should be on the front panel of the label.
3. The changes in directions for use are acceptable.

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CONCURRENCES

SYMBOL							
SURNAME							
DATE							

4. Assure that the net contents appear on the product label or on the package.

Sincerely yours,

Susan T. Lewis
Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

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IMPEL RODS

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 24 1991

Under ...
Fungicide, and ...
amended, for ...
registered under EPA Reg. No.

10356-16

Solid Wood Preservative

For the Protection of Wood Against Fungal Decay

Keep out of reach of children

CAUTION

ACTIVE INGREDIENT:

Anhydrous Disodium Octaborate ($Na_2 B_8 O_{13}$)100.0%
(Boric Oxide Equivalent.....82.0%)

INERT INGREDIENTS:.....0.0%
TOTAL 100.0%

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION: May be harmful if swallowed. Avoid breathing the dust and contact with skin, eyes, and clothing. Wash thoroughly after handling and before eating, drinking and smoking. Remove contaminated clothing and wash before reuse. **Statement of Practical Treatment:** In case of eye contact flush with plenty of water and see a physician. In case of skin contact, wash with plenty of water. If swallowed, call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching the back of the throat with finger, or if available, by administering syrup of ipecac. Do not induce vomiting or give anything to an unconscious person. **Environmental Hazards:** Do not apply this product directly to water. Do not contaminate water when disposing of equipment washwaters.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Store in dry conditions at all times and out of the reach of children. **Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Packaging Disposal:** Dispose of empty packaging in a sanitary landfill through ordinary trash collection or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. READ THE ENTIRE LABEL BEFORE USE.

Directions for Wood and Wood Products: IMPEL Rods are recommended for the preventive and remedial protection of wood and wood products, including: lumber, timbers, logs, millwork, poles, piles, posts, crossties, laminated beams, etc., against fungal decay.

The rate of application for IMPEL Rods is 6.0 ounces of Boric Acid Equivalent (BAE) per cubic foot of wood for remedial treatments and 2.0 ounces of BAE per cubic foot of wood for preventive treatments. IMPEL Rods contain 1.45 ounces of BAE per ounce. The following table shows the BAE content for each size of IMPEL Rod:

Dimensions (dia." x length")	Weight (ounces)	Boric Acid Equivalent (ounces)
1/4 x 1/2	0.02	0.03
1/3 x 1/2	0.05	0.07
1/3 x 1	0.10	0.14
1/3 x 2 5/8	0.23	0.33
1/2 x 2	0.43	0.62
1/2 x 4	0.85	1.23
3/4 x 3	1.40	2.03

IMPEL Rods are designed to be inserted into decaying wood or wood in high risk areas through drilled holes. They are positioned in such a way that moisture will distribute the desired loadings of preservative throughout the target area.

There are three steps to install IMPEL Rods:

- 1) Drill appropriate sized holes to accomodate the predetermined number and size of IMPEL Rods required;
- 2) Insert the suitable size and number of IMPEL Rods into the holes; and
- 3) Seal the holes with a treated wooden dowel, wood filler or caulk.

Drill holes 1/16" greater in diameter than the preservative rods to result in a snug fit. This will ensure proper diffusion in all directions from the rod. In addition, leave a minimum of 1/8" of headspace between IMPEL Rods and dowels or sealants to allow for expansion. After installation, paint or any other type of surface coating may be applied to the wood if desired.

Install IMPEL Rods in the general vicinity of where the potential for decay is greatest or where decay exists. IMPEL Rods can be inserted through any wood surface depending on access, in either a staggered, linear or angled pattern. Start at six inches from a

joint or the end of the wood and cover the entire affected length. Linear spacings along the grain should not exceed 18 inches on center and spacings across the grain should not exceed 6 inches on center.

Conditions for Sale and Warranty

Chemical Specialties, Inc. (CSI) warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label, only when used in accordance with the label directions under normal conditions of use. **CSI MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of CSI. Risks such as ineffectiveness or other unintended consequences resulting from, but not limited to, failure to follow label direction will be assumed by the Buyer or User. **IN NO CASE WILL CSI BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE, OR USE OF THIS PRODUCT.**

Chemical Specialties, Inc.
One Woodlawn Green, Suite 250
Charlotte, North Carolina 28217
704-522-0825

EPA Registration No. 10356-16
EPA Establishment No. 10465-EN-1

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