

OCT 14 1994

Chemical Specialties, Inc.
c/o Eliot Harrison
Delta Analytical Corporation
7910 Woodmont Avenue Suite 1000
Bethesda, MD 20814

Gentlemen:

Subject: 6(a)(2) Adverse Data - Revised Labeling
ACQ-C2
EPA Registration No. 10356-23
Your Submission Dated September 30, 1994

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 in toxicity category I for eye irritation, the Pesticide Disposal section must read:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes 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.

See PR Notice 83-3. Please note that your July 21st submission had the correct wording.

b. The preferred location for "Keep Out Of The Reach Of Children" is immediately above the Signal Word DANGER.

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

275-

-2-

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

Sincerely yours,

Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosure

DIRECTIONS FOR USE

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

Use ACQ-C2 to control all types of fungal decay of wood products - brown, white and soft rot and wood eating insects including termites. ACQ-C2 should be used to treat any wood product that will be exposed to conditions favorable to rot, decay or insect attack both above ground and in ground or water. Types of products include lumber, timbers, landscape ties, fence posts, building and utility poles, land, freshwater and marine piling, sea walls, decking and wood shingles.

Mix ACQ-C2 with either ACQ-50 (EPA Reg. No. 6836-213-10356) or ACQ-80 (EPA Reg. No. 6836-212-10356) to make treatment solutions. Apply these solutions by pressure impregnation. Follow the mixing instructions on the attached page Technical Bulletin No. 1 (Solution Mixing Table for ACQ-C2 2 Component) for obtaining the desired solution concentration. The percent solution to be used should be based on the retention, in lbs. per cubic foot (pcf), specified by the purchaser and by the treating process used.

A single application of a 3% solution can be used to field coat the cut ends of pressure treated wood by brush-on application.

ACQ-C2

For the control of wood damaging fungi and insects. For industrial use only

ACTIVE INGREDIENT

Copper as elemental 9.0%

INERT INGREDIENTS 91.0%

**From mixed Copper ethanolamine complexes.*

DANGER
KEEP OUT OF
REACH OF CHILDREN

Statement of Practical Treatment

If in eyes: Call a physician. Hold eyelids open and flush with a steady gentle stream of water for 15 minutes.

If on skin: Wash with plenty of soap and water. Get medical attention.

If swallowed: Drink promptly a large quantity of milk, egg white, gelatin solution, or, if these are not available, large quantities of water. Avoid alcohol. Get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

See side panel for additional
precautionary statements
Net Contents:

Chemical Specialties, Inc.
One Woodlawn Green, Suite 250
Charlotte, NC 28217
EPA Reg. No. 10356-23
EPA Est. No. 10465-NC-1

PRECAUTIONARY STATEMENT

Hazards to Humans
Domestic Animals

Danger. Corrosive. Causes irreversible burns. Do not get in eyes, on skin. Wear goggles or face shield and rubber gloves. Wash thoroughly with soap and water before eating, drinking or using tobacco. Wash contaminated clothing before reuse. Repeated skin contact may cause irritation.

ENVIRONMENTAL HAZARDS: Do not discharge effluent into lakes, streams, ponds, estuaries, oceans or other bodies of water in accordance with the requirements of the National Discharge Elimination System (NDES) unless a permitting authority has been notified and discharge is permitted. Do not discharge effluent into sewer systems without previously notifying the appropriate plant authority. For guidance, contact your local or Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL: Do not store in food or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes from this product may be disposed of on-site at a designated disposal facility.

CONTAINER DISPOSAL: Triple rinse and offer for recycling or reconditioning, or for use in a sanitary landfill.

ACCEPTED
with COMMENTS
In EPA Letter D-10356-23

BEST AVAILABLE COPY

10356-23

0.65%	0.433%	0.217%	31.4	4.74	963.8
0.70%	0.467%	0.233%	33.9	5.11	961.0
0.75%	0.500%	0.250%	36.3	5.48	958.2
0.80%	0.533%	0.267%	38.7	5.85	955.4
0.85%	0.567%	0.283%	41.2	6.21	952.6
0.90%	0.600%	0.300%	43.6	6.58	949.8
0.95%	0.633%	0.317%	46.1	6.95	947.0
1.00%	0.667%	0.333%	48.5	7.32	944.1
1.10%	0.733%	0.367%	53.4	8.06	938.5
1.20%	0.800%	0.400%	58.4	8.80	932.8
1.30%	0.867%	0.433%	63.3	9.55	927.2
1.40%	0.933%	0.467%	68.2	10.29	921.5
1.50%	1.000%	0.500%	73.2	11.04	915.8
1.60%	1.067%	0.533%	78.1	11.79	910.1
1.70%	1.133%	0.567%	83.1	12.53	904.4
1.80%	1.200%	0.600%	88.0	13.28	898.7
1.90%	1.267%	0.633%	93.0	14.04	892.9
2.00%	1.333%	0.667%	98.0	14.79	887.2
2.10%	1.400%	0.700%	103.0	15.55	881.4
2.20%	1.467%	0.733%	108.0	16.30	875.7
2.30%	1.533%	0.767%	113.1	17.06	869.9
2.40%	1.600%	0.800%	118.1	17.82	864.1
2.50%	1.667%	0.833%	123.1	18.58	858.3
2.60%	1.733%	0.867%	128.2	19.34	852.5
2.70%	1.800%	0.900%	133.2	20.10	846.6
2.80%	1.867%	0.933%	138.3	20.87	840.8
2.90%	1.933%	0.967%	143.4	21.54	835.0
3.00%	2.000%	1.000%	148.5	22.40	829.1
3.10%	2.067%	1.033%	153.6	23.17	823.2
3.20%	2.133%	1.067%	158.7	23.94	817.4
3.30%	2.200%	1.100%	163.8	24.72	811.5
3.40%	2.267%	1.133%	168.9	25.49	805.6
3.50%	2.333%	1.167%	174.1	26.27	799.7
3.60%	2.400%	1.200%	179.2	27.04	793.7
3.70%	2.467%	1.233%	184.4	27.82	787.8
3.80%	2.533%	1.257%	189.6	28.60	781.8
3.90%	2.600%	1.300%	194.7	29.38	775.9

Solution Mixing Table for ACQ-C2 (2 Component)

Solution Strength % Active	Component Balance Active Basis (%)		To Mix 1000 Gallons Solution Combine following Gallons of		
	CuO	Quat	ACQ-C2	ACQ-Q80	Water
0.60%	0.400%	0.200%	28.4	2.83	968.7
0.65%	0.433%	0.217%	30.8	3.07	966.1
0.70%	0.467%	0.233%	33.2	3.31	963.5
0.75%	0.500%	0.250%	35.6	3.55	960.8
0.80%	0.533%	0.267%	38.0	3.79	958.2
0.85%	0.567%	0.283%	40.4	4.03	955.6
0.90%	0.600%	0.300%	42.8	4.26	952.9
0.95%	0.633%	0.317%	45.2	4.50	950.3
1.00%	0.667%	0.333%	47.6	4.74	947.7
1.10%	0.733%	0.367%	52.4	5.22	942.4
1.20%	0.800%	0.400%	57.2	5.70	937.1
1.30%	0.867%	0.433%	62.1	6.18	931.7
1.40%	0.933%	0.467%	66.9	6.67	928.4
1.50%	1.000%	0.500%	71.8	7.15	921.1
1.60%	1.067%	0.533%	76.6	7.63	915.7
1.70%	1.133%	0.567%	81.5	8.12	910.4
1.80%	1.200%	0.600%	86.4	8.61	905.0
1.90%	1.267%	0.633%	91.3	9.09	899.6
2.00%	1.333%	0.667%	96.2	9.58	894.3
2.10%	1.400%	0.700%	101.1	10.07	888.9
2.20%	1.467%	0.733%	106.0	10.56	883.5
2.30%	1.533%	0.767%	110.9	11.05	878.0
2.40%	1.500%	0.800%	115.8	11.54	872.8
2.50%	1.667%	0.833%	120.8	12.04	867.2
2.60%	1.733%	0.867%	125.7	12.53	861.7
2.70%	1.800%	0.900%	130.7	13.02	856.3
2.80%	1.867%	0.933%	135.7	13.52	850.8
2.90%	1.933%	0.967%	140.7	14.02	845.3
3.00%	2.000%	1.000%	145.7	14.51	839.8
3.10%	2.067%	1.033%	150.7	15.01	834.3
3.20%	2.133%	1.067%	155.7	15.51	828.8
3.30%	2.200%	1.100%	160.7	16.01	823.3
3.40%	2.267%	1.133%	165.7	16.51	817.8
3.50%	2.333%	1.167%	170.8	17.01	812.2
3.60%	2.400%	1.200%	175.8	17.52	806.7
3.70%	2.467%	1.233%	180.9	18.02	801.1
3.80%	2.533%	1.267%	185.9	18.53	795.5
3.90%	2.600%	1.300%	191.0	19.03	789.9