MAR 2 9 1991

Ms. Sue Crescenzi Steptoe & Johnson 1330 Conn. Ave., N.W. Washington, D.C. 20036



Dear Ms. Crescenzi:

Subject: Updated Confidential Statement of Formula and

Label Amendment, addition of uses

Copsol

EPA Registration Number 10465-1

Your Submission Dated February 15, 1991

The labeling and updated Confidential Statement of Formula (dated 2/14/91) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit three (3) copies of final printed labeling incorporation this amendment.

In reviewing our files we have noticed that there is no record of the analysis of the active ingredient for this product or any reference MRID#. We are requesting that you provide copies of the analytical data for our records.

The Agency will inform you of the publication in the Federal Register of your request to drop uses for this product.

Sincerely yours,

Joanne I. Miller Product Manager (23) Fungicide-Herbicide Branch Registration Division (H7505C)

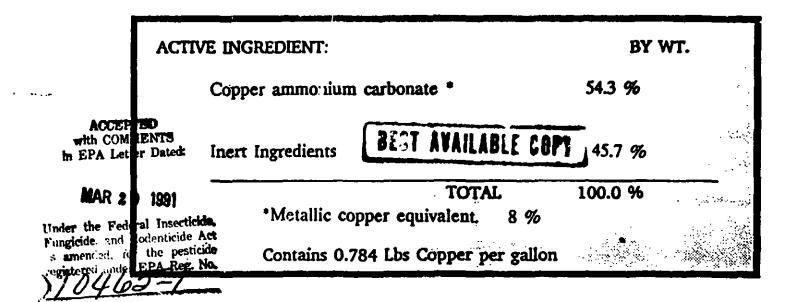
Enclosure

CONCURRENCES								
SYMBOL	H7505C							
SURNAME	Robbins							
DATE	3/28/91		_					
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EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

PH22 10356-19 COPSOL**



CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes eye and skin irritation. Harmful if swallowed, absorbed through the skin or inhaled. May cause skin sensitization reactions in certain individuals. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Protective clothing, including goggles, should be worn. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES, thush with plenty of water. Call a physician. IF ON SKIN, wash with plenty of soap and water. Get medical attention if irritation persists. 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 on give anything by mouth to an unconscious person.

SEE ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured by
Mineral Research & Development Corp.
One Woodlawn Green
Charlotte, North Carolina 28217
EPA EST NO. 10465-NC-1
NET

EPA REG. No. 10465-1

M65-NC-1 NET CONTENTS ___ GALLONS



PRECAUTIONARY STATEMENT ENVIRONMENTAL HAZARDS

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Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters. This pesticide is toxic to fish. Do not discharge into lakes, streams, ponds or public waters unless in accordance with a NPDES permit. Do not contaminate water by cleaning equipment or disposal of wastes. For guidance contact your Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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

STORAGE

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

DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under the Resource Conservation and Recovery Act.

PLASTIC CONTAINERS: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL INSTRUCTIONS

FOR USE ON

BEANS: For control of Common and Bacterial Blight, beginning at disease appearance, spray 4 to 5 times at 10 to 14 day intervals.

CARROTS: For control of Early and Late Blight, spray when plants are 6" high, 3 to 5 applications at 7 to 10 day intervals.

CELERY: For control of Early and Late Blight, spray on appearance of disease, 4 to 7 applications at weekly intervals.

CITRUS: [Orange, Grapefr it, Tangerine, Temple, Tangelo, Lemon, Lime] Mix 3/4 to 1 gallon of Copsol in 500 gallons of water in GROUND EQUIPMENT or 3 to 4 gallons in 10 to 15 gallons of water per acre by AIRCRAFT, and apply as a thorough coverage spray to control the following diseases:

- Melanose-Spray thoroughly 1 to 3 weeks after petal fall and make second applications 4 weeks later.
- Scab-(Temple, Murcott, Satsuma, Grapefruit, Tangelo and Lemon are the more susceptible varieties.) Apply 2 spray applications. FIRST just before the trees begin to flush and SECOND when 2/3 petals have fallen.
- Greasy Spot-Spray post bloom and within one month after leaf expansion of any growth flush.



CUCURBITS: [Cantaloupes, Melons, Cucumbers, Squash] For control of Powdery Mildew, Downy Mildew, Scab, Alternaria and Angular Leaf Spots, spray weekly beginning after vining and continue until mid-harves?

GRAPES: For control of Anthracnose, spray when first leaves appear, just before blooming, just after blooming and at 2 week intervals thereafter until 2 weeks before harvest. Use with 4 pounds of hydrated lime.

PEANUTS: For control of Cercospora Leaf Spot, spray on appearance of disease, 4 to 8 sprays at 10 to 14 day intervals.

PEPPERS: To control Cercospora Leaf Spot and Bacterial Spot, spray at 7 to 10 day intervals.

POTATOES (IRISH): To control Early and Late Blight, spray on or before first appearance of the disease in the area, 4 to 6 sprays at 7 to 10 day intervals.

STRAWBERRIES: To control Leaf Spot and Scorch, spray at 7 to 10 day intervals from time new growth starts until harvest.

SUGAR BEETS: To control Cercospora Leaf Spot, spray on disease appearance, 3 to 6 sprays at 14 day intervals.

TOMATOES: To control Early and Late Blight and Bacterial Spot, spray in seed beds at emergence and continue on 4 to 5 day schedules. In field, begin applications immediately after transplanting or emergence and continue at 4 to 5 day intervals. In areas or seasons when disease is less severe, time between applications may be 5 to 7 days. Complete coverage is essential to good control.

FOR TREATMENT OF BURLAP

COPSOL is a copper based mildewcide specifically formulated to impart fungus resistance on burlap in accordance with Military Specification MIL-F-46032A. The operational procedure to obtain a treated product that will pass the product specifications requires the use of a treating tank that is not constructed of, or contains any brass or bronze materials.

Dilute the concentrated COPSOL 1:1 with water in the treatment tank and immerse the burlap to be treated. Keep the burlap submerged in the tank until the burlap has obtained an analysis of 1.5 % to 2.0 % metallic copper measured on a dry basis.



FOR TREATMENT OF WOOD PRODUCTS

COPSOL solution is to be used to formulate a 10% Ammoniacal Copper Quat (ACQ) Type A, Type B or Type C solution for wood preservation that will be impregnated into the lumber, millwork, poles, piles, using a vacuum pressure system.

Do not use in contact with brass, bronze, or copper.

TYPE A INSTRUCTIONS

To 1000 gallons of COPSOL Solution add 168 gallons of Sequel Q, (EPA registration number 6836-53-10356; Active Ingedient: Didecyl dimethly ammonium chloride; Distributed by Chemical Specialities, Inc., Charlotte, NC), with agitation. This formula will yield 1168 gallons of ACQ Type A containing 8.9% CuO and 8.9% Didecyl dimethyl ammonium chloride on a weight/weight basis.

TYPE B INSTRUCTIONS

To 1000 gallons of COPSOL Solution add 84 gallons of Sequel Q, (EPA registration number 6836-53-10356; Active Ingedient: Didecyl dimethly ammonium chloride; Distributed by Chemical Specialities, Inc.), with agitation. This formula will yield 1084 gallons of ACQ Type B containing 9.4% CuO and 4.7% Didecyl dimethyl ammonium chloride on a weight/weight basis.

TYPE C INSTRUCTIONS

To 1000 gallons of COPSOL Solution add 56 gallons of Sequel Q, (EPA registration number 6836-53-10356; active Ingedient: Didecyl dimethly ammonium chloride; Distributed by Chemical Specialities, Inc.), with agitation. This formula will yield 1056 gailons of ACQ Type C containing 9.6% CuO and 3.2% Didecyldimethylammonium chloride on a weight/weight basis.



SPECIFIC USE INSTRUCTIONS

For ACQ Type A, Type B and Type C Solutions

ontents for use only in pressure treating vessel for forest pre vets cannot be used in concentrated rm. Do not attempt to use without implementing the necessary safety equipment. To be used only in impregnation of forest product utilizing water solutions having concentrations ranging from 0.5% to 10% by weight. Impregnation procedures must rigidly adhere to applicable specifications of the American Wood Preservers' Association. Treated wood is provided protection against termites, ascomycetes, brown rot and white rot.

Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (i.e. handling freshly treated wood and manually opening cylinder doors.

Individuals who enter pressure treatment cylinders and other related equipment that is 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. In addition, individuals who enter pressure-treatment cylinders must wear properly fitting, well maintained, high efficiency respirators, MSHA/NIOSH-approved for ammonia. If level of ammonia in the plant is unknown or exceeds 35 ppm (STEL) or 25 ppm (ACGIH) of air averaged over an 8-hour work period, air monitoring programs, procedures and record retention and submission must be conducted in accordance with OSHA standards.

Applicators must not eat, drink or use tobacco products during those parts of the applications process that may expose them to the wood treatment formulation (e.g. manually opening/closing cylinder doors, moving trams out of cylinders, mixing chemicals and handling freshly treated wood.

Wash thoroughly after skin contact and before eating, drinking, use of tobacco products, or using restrooms.

Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and workshoes or boots and equipment at the plant. Wornout protective clothing and workshoes or boots must be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.



CONDITIONS OF SALE AND WARRANTY

Seller warrants that its product conforms in its standard specifications set forth on this label. SELLER MAKES NO OTHER REPRESENTATIONS OR WARRANTIES OF ANY KIND, AS TO THE MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE OR ANY OTHER MATTER WITH RESPECT TO THE PRODUCT, WHETHER USED ALONE OR IN COMBINATION WITH ANY OTHER MATERIAL. BUYER ASSUMES ALL RISKS TO PERSONS OR PROPERTY ARISING OUT OF THE USE OR HANDLING AND ACCEPTS THE PRODUCT SUBJECT TO THE CONDITIONS SET FORTH ON THIS LABEL. BECAUSE OF TIME, CEOGRAPHICA'. LOCATION, RATE OF APPLICATION, AND OTHER CONDITIONS ARE BEYOND SELLER'S CONTROL, SELLERS LIABILITY FOR ANY LOSS OR DAMAGES ARISING OUT OF ANY CAUSE INCLUDING STORAGE, HANDLING AND USE OF THIS PRODUCT SHALL IN NO EVENT EXCEED THE PURCHASE PRICE OF THE PRODUCT IN RESPECT TO WHICH SUCH CAUSE ARISES OR AT SELLER'S OPTION THE REPLACEMENT OF SUCH PRODUCT AND IN NO EVENT SHALL SELLER BE LIABLE FOR INCIDENTAL, SPECIAL, CONSEQUENTIAL OR PUNITIVE DAMAGES RESULTING FROM ANY CAUSE. No claim for any cause whatsoever shall be allowed unless Buyer gives Seller prompt written notice thereof. Failure to commence action with respect to such claim within a year from the date of delivery of COPSOL for which a claim is alleged, shall constitute a waiver by Puyer of any such claim.

