

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 23 1997

Wendy A. McCombie  
Lewis & Harrison  
122 C Street, NW #740  
Washington, DC 20001

Subject: Impel Rods  
EPA Registration No. 10465-30  
Notification Per PR-Notice 95-2

Dear Ms. McCombie:

This will acknowledge receipt of your notification, to change your establishment number and the phrase "Manufactured by" to "Manufactured for", submitted under the provisions of FIFRA section 3 (c) 9. Based on a review of the submitted material, the following comments apply.

The application is acceptable and the notification has been made a part of the records for this file.

Sincerely,


Wanda Y. Mitchell  
Notification Coordinator  
Regulatory Management Branch II  
Antimicrobial Division (7510W)

| CONCURRENCES |          |  |  |  |  |  |  |
|--------------|----------|--|--|--|--|--|--|
| SYMBOL       | 7510W    |  |  |  |  |  |  |
| SURNAME      | Mitchell |  |  |  |  |  |  |
| DATE         | 5-23-97  |  |  |  |  |  |  |

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

|  |  |  |
|--|--|--|
|  <b>EPA</b><br>United States<br><b>Environmental Protection Agency</b><br>Washington, DC 20460 | <input type="checkbox"/> Registration<br><input type="checkbox"/> Amendment<br><input checked="" type="checkbox"/> Other | OPP Identifier Number<br><h2 style="text-align: center;">230556</h2> |
|--|--|--|

### Application for Pesticide - Section I

|  |   |   |
|--|---|---|
| 1. Company/Product Number<br><b>10465-30</b>   | 2. EPA Product Manager<br><b>Connie Welch</b> | 3. Proposed Classification<br><input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted  |
| 4. Company/Product (Name)<br><b>Impel Rods</b>   | PM#<br><b>21</b>                              |   |
| 5. Name and Address of Applicant (Include ZIP Code)<br><b>Chemical Specialties, Inc.</b><br><b>One Woodlawn Green, Suite 250</b><br><b>Charlotte, NC 28217</b><br><b><u>PLEASE DIRECT ALL CORRESPONDENCE TO</u></b><br><b><u>"CONTACT POINT" LISTED BELOW</u></b><br><input type="checkbox"/> Check if this is a new address |   | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:<br><b>NOTIFICATION</b><br>EPA Reg. No. _____<br>Product Name _____ |

### Section - II

|  |  |
|--|--|
| <input type="checkbox"/> Amendment - Explain below.                            | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application  |
| <input checked="" type="checkbox"/> Notification - Explain below.              | <input type="checkbox"/> Other - Explain below   |

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

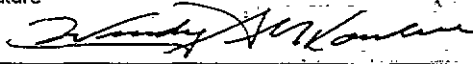
Notification of minor label changes in Accordance with PR Notice 95-2\*. CSI is changing the Est. No. 10465-WA-1 to 10465-NC-002. They are also changing the phrase "Manufactured by" to "Manufactured for".

\*PR Notice 95-2 Certification Statement is attached.

### Section - III

|   |  |   |  |  |   |
|---|--|---|--|--|---|
| 1. Material This Product Will Be Packaged In:   |  |   |  | 2. Type of Container   |   |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes*<br><input checked="" type="checkbox"/> No  | Unit Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No |  | <input type="checkbox"/> Metal   | <input checked="" type="checkbox"/> Plastic |
| *Certification must be submitted  |  | If "Yes" Unit Packaging wgt.    No. per container   | If "Yes" Package wgt.    No. per container | <input type="checkbox"/> Glass   | <input type="checkbox"/> Paper              |
| 3. Location of Net Contents Information<br><input checked="" type="checkbox"/> Label <input type="checkbox"/> Container   |  | 4. Size(s) Retail Container<br><p style="text-align: center;">N/A</p>                             |  | 5. Location of Label Directions<br><input checked="" type="checkbox"/> On Label<br><input type="checkbox"/> On labeling accompanying product |   |
| 6. Manner in Which Label is Affixed to Product<br><input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____<br><input checked="" type="checkbox"/> Paper glued<br><input type="checkbox"/> Stenciled |  |   |  |  |   |

### Section - IV

|  |   |  |
|--|---|--|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)   |   |  |
| Name <b>Wendy A. McCombie, Lewis &amp; Harrison</b><br><b>122 C St. NW #740, Washington DC 20001</b>   | Title<br><b>Agent for Chemical Specialties, Inc.</b>    | Telephone No. (Include Area Code)<br><b>202-393-3903</b>   |
| <b>Certification</b><br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. |   | 6. Date Application Received<br><div style="text-align: center; border: 1px solid black; padding: 5px;"><b>(Stamped)</b></div> |
| 2. Signature<br>  | 3. Title<br><b>Agent for Chemical Specialties, Inc.</b> |  |
| 4. Typed Name<br><b>Wendy A. McCombie, Lewis &amp; Harrison</b>  | 5. Date<br><b>04/23/97</b>                              |  |

# LEWIS & HARRISON

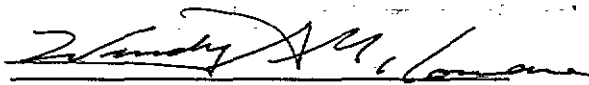
122 C Street, N.W., Suite 740  
Washington, D.C. 20001  
telephone 202.393.3903  
fax 202.393.3906

Consultants in Government Affairs

**Impel Rods (EPA Reg. No. 10465-30)  
Chemical Specialties, Inc.**

**Notification of Minor Label Changes as per PR Notice 95-2:**

This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.



Wendy A. McCombie, Lewis & Harrison, L.L.C.  
Agent for Chemical Specialties, Inc.

04/23/97

Date

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS & 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 or smoking. Remove contaminated clothing and wash before reuse.

### ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other 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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### CONDITIONS OF SALE AND WARRANTY

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 label directions under normal conditions of use. **CSI MAKES NO OTHER EXPRESSED 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 directions 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.**

## IMPEL RODS

### SOLID WOOD PRESERVATIVE FOR THE PROTECTION OF WOOD AGAINST FUNGAL DECAY

#### ACTIVE INGREDIENTS:

Anhydrous Disodium Octaborate (Na<sub>2</sub>B<sub>8</sub>O<sub>13</sub>) 100.0%  
(Boric Oxide Equivalent) 82.0%

#### INERT INGREDIENTS:

TOTAL 0.0%  
100.0%

## KEEP OUT OF REACH OF CHILDREN CAUTION

### 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 to 2 glasses of water, and induce vomiting by touching back of throat with finger or if available, by administering Syrup of ipecac. Do not induce vomiting or give anything to an unconscious person.

See Side Panel for Additional Instructions

Manufactured For:  
Chemical Specialties, Inc.  
One Woodlawn Green, Suite 250  
Charlotte, NC 28217  
Phone (704) 455-5181

US PAT. No. 4661157

EPA Reg. No. 10465-30

EPA Est. No. 64910-FL-001

EPA Est. No. 10465-NC-002

IMPEL is a registered trademark of  
Chemical Specialties, Inc., Charlotte, NC.

## 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<sup>®</sup> Rods are recommended for the preventive and remedial protection of wood and wood products, including lumber, timbers, logs, millwork, poles, piles, posts, crossites, 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 preventative treatments. IMPEL Rods contain 1.45 ounces of BAE per ounce. The following table shows the BAE for each size of IMPEL Rods:

| IMPEL RODS BY SIZE AND BORIC ACID EQUIVALENT |                    |                 |
|--|--------------------|-----------------|
| Dimensions<br>(dia. x length)                | Weight<br>(ounces) | BAE<br>(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 accommodate 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 hole with a treated wood dowel, wood filler or caulk.

Drill holes 1/16 inch 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 inch of headspace between IMPEL Rods and hole plug 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 6 inches from a joint or the end of the wood and cover the entire affected length. Linear spacings along the grain should not exceed 15 inches on center and spacings across the grain should not exceed 6 inches on the center.

### 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 on site or at an approved waste disposal facility.

**Packaging Disposal:** Disposal 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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