

7M 22 51,88-3 10/11
APR 13 1992

Patricia L. Lawson
Product Regulation and Toxicology
Akzo Chemicals
300 South Riverside Plaza
Chicago, Illinois 60606

Dear Ms. Lawson:

Subject: Copper Naphthenate 8%
EPA Registration No. 34688-3 ✓
Product Chemistry Data
Your Letter Dated 12/10/91

The Agency has completed its review of your product chemistry submission. The following comments are provided in response to the questions raised in our letter of 11/4/91.

The product chemistry data for Series 61 and 62 submitted in MRID Nos. 41673901, 41673902, 41825301 and 41825302 are acceptable. However, you are still required to submit Series 63 (physical and chemical characteristics) data. This data must be submitted or cited by MRID number at reregistration or when the Agency may require them.

Impurities identified at 0.1% have been specified in the revised CSF dated 12/10/91. The CSF dated 5/4/87, has been canceled.

The specific names and addresses for the suppliers for the commodity chemicals have been specified on the revised CSF, dated 12/10/91. The technical bulletin for COPPER NAPHTHENATE 8% is acceptable.

Regarding the CSF dated 12/10/91, for the basic formulation, the label claim for Copper Naphthenate is based on the nominal concentration in compliance with PR Notice 91-2. The certified limits specified under column 14, which are based on metallic copper content, should be converted in terms of copper naphthenate. As required in PR Notice 91-2, the nominal concentration of the active ingredient must fall between the upper and lower certified limits. This must be done at reregistration or by July 1, 1997, as specified in PR Notice 91-2. The certified limits must comply with

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Note that butyl carbitol is contained on List No. 2 of PP Notice 87-6 as a potentially toxic inert/high priority for testing.

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.

The term "Inert Ingredient" should be made plural and be listed in the ingredient statement as follows:

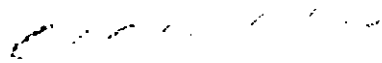
Inert Ingredients**.....37.5%

**Contains Petroleum Distillates (this should be a footnote).

Under "Pesticide Disposal", the word "waste" should be made plural.

You must submit five (5) copies of your finished printed labeling.

Sincerely Yours,


Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

STORAGE AND DISPOSAL

PESTICIDE STORAGE:

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

PESTICIDE DISPOSAL:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

CONTAINER DISPOSAL:

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.

DIRECTIONS FOR USE

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

Formulators are responsible for obtaining registrations on their own end-use products.



COPPER NAPHTHENATE 8%

EPA Registration Number 34688-3

EPA Establishment Number 34688-NJ-1

For repackaging or formulation of fungicides only

For further information, see Product Technical Bulletin

ACTIVE INGREDIENT:

✓ Copper Naphthenate*.....62.5%

*Copper as metallic.....8%

INERT INGREDIENTS**

*** Petroleum Distillates.....37.5%

WARNING

KEEP OUT OF REACH OF CHILDREN

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED

Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

IF ON SKIN

Immediately wash exposed skin with soap and water. Remove contaminated clothing, including shoes, and thoroughly clean and dry before reuse. Get prompt medical attention if irritation develops.

IF IN EYES

Immediately flush eyes with plenty of water for at least 15 minutes. Then get immediate medical attention.

IF INHALED

Move to fresh air. Get immediate medical attention.

SEE SIDE PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS

PRECAUTIONS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning. May be harmful if swallowed. May irritate skin, eyes, and mucous membranes.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not apply near water. Do not apply to estuaries, oceans, or other bodies of water. Do not apply to areas where discharge effluent enters sewer systems. Notify the local health authority. For more information, contact the Water Board. Do not contaminate equipment or clothing.

PHYSICAL AND CHEMICAL HAZARDS

Do not use, store, or dispose of near open flame. Do not use near heat. Do not use near electrical equipment. Do not use near children. Do not use near livestock. Do not use near crops. Do not use near water. Do not use near food. Do not use near feed. Do not use near clothing. Do not use near equipment. Do not use near containers.

Manufactured by

Akzo Chemicals
300 South Rte. 1
Chicago, Illinois

NET WEIGHT

DEFINITION

A copper salt of refined naphthenic acid in mineral spirits.

TYPICAL PHYSICAL PROPERTIES

| | |
|---------------------------|---------------|
| Specific Gravity @ 75°F. | 0.940 - 1.040 |
| Color | Green |
| Viscosity (Gardner-Holdt) | Z-4 |
| Copper Metal, % | 7.8 - 8.2 |
| Pounds Per Gallon | 7.83 - 8.66 |

BEST AVAILABLE COPY

DIRECTIONS FOR USE

Readily soluble in low cost petroleum solvents. It can be used in conjunction with mineral spirits, kerosene, lubricating oil, waste crank oil, creosote, and paint drying oils for treating wood, textiles, and other fibrous structures.

SUGGESTED DOSAGE

The usual addition of copper metal based on total weight of finished compound is in the range of 1 to 3%.

TOXICITY

No observation of ill effects in the handling of the solvents or goods containing copper naphthenate.

GENERAL INFORMATION

Copper Naphthenate 8% is carefully adjusted to contain the specific metal content with minimum tolerance, plus or minus.

NOTE: Any variation in your products labeling, text, or art work from that included, may result in the need for additional data to support registration.

3/13/75