



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 24 2006

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Schirm USA, Inc. c/o
Don O'Shaughnessy, Ph.D., DABT, DABFM
D.O.C. Inc., 21 Birch Parkway,
Sparta, NJ 07871

Subject: Submission of an amendment to revise the label in accordance with the Federal Fungicide and Rodenticide Act as amended.

Product Name: FINACIDE LQ™

EPA Registration Number: 39578-3

Date of Submissions: September 26, 2005, October 10, 2005, November 2, 2005, and May 5, 2006.

Dear Dr. O'Shaughnessy;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

Since there are numerous revisions identified below, two copies of the finished labeling must be submitted prior to releasing the product for shipment.

Note: Remove all text identified with a strikeout and insert all text identified with italics as new text to complete an appropriate sentence or repair a typographical error.

1. Page 1 of 11:

a. Remove the following uses and text from label:

- i. "and food-handling establishments such as supermarkets, restaurants and food processing plants."
- ii. "May be used on non-food contact surfaces in edible product areas of official establishments operating under the Meat, Poultry, Shell Egg Grading and Egg Products Inspection Programs."

There currently are no tolerances for application of Disodium Octaborate Tetrahydrate or any other borates for use in food processing areas. The only tolerances listed in 40 CFR are for use of borates when applied to raw agricultural commodities (RACS).

b. **Remove the statement** "Product of Italy", since the establishment number on the proposed label is Texas, and the legend lists "Manufactured by".

c. **Remove the statement** "(For most applications, 1 gallon of concentrate covers approximately 800 square feet of wood surface)" The directions for rates and types of equipment for application vary, so this is false and misleading.

2. Page 2 of 11:

- a. Within the corresponding label subsection entitled "Hazards to Humans and Domestic Animals" **revise** the text to read as follows: "**CAUTION:** Harmful if swallowed, absorbed through skin, or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Do not breathe (vapor or spray mist). Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco." **Remove the following statements:** "Avoid contamination of food and feed. Do not leave container where children or animals may gain access."
- b. Move the following corresponding label statement "FOR CHEMICAL EMERGENCY, SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT Call CHEMTREC - Day or Night: 1-800-424-9300 toll free in the continental U.S., Puerto Rico, or U.S. Virgin Islands. For calls originating elsewhere: 703-527-3887 (collect calls accepted). Notice: Read and understand the entire label before using. Use only according to label directions. Before buying or using this product, read DISCLAIMER and LIMITED WARRANTY statements found elsewhere on this label. If terms are unacceptable, return unopened package to seller for full refund of purchase price. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under the DISCLAIMER and LIMITED WARRANTY. Either to the front panel of the label, or at the end of the label.

3. Page 3 of 11:

- a. Within the corresponding label paragraph "Treatment is long lasting as long as the treated material is not exposed to rain; or continuous water or contact with the ground. For temporary protection of wood in contact with soil, see further instructions below." **remove** the comma between the words "rain" and "or".
- b. **Revise** the corresponding label sentence as follows "Types of materials that can be treated include, ~~but are not limited to, all~~ listed types of lumber, logs, plywood, particle board, ~~paper, cardboard, etc.~~ In addition, FINACIDE LQ may be applied to non-cellulose construction materials such as concrete, brick, metals, and plastic (e.g. plumbing pipe) as part of an application for prevention of termites. Apply FINACIDE LQ ~~should be applied only~~ to bare, clean wood, plywood, particle board and other cellulosic materials-where an intact water-repellent barrier such as paint, stain, or a sealer is not present." The strikeouts and words added clarify open-ended uses, and or application sites that do not have corresponding directions for use on the label.
- c. **Remove** the following corresponding label statement, since it is an implied safety claim: "Since FINACIDE LQ is applied directly to the wood, it can be used in areas where environmental contamination is of concern (nearby wells, cisterns, etc.)."
- d. Move the following statement to directly below the header "**GENERAL INFORMATION**" "FINACIDE LQ is not intended as a substitute for mechanical alteration, soil treatment or foundation treatment. Finacide LQ is not intended for application to soil. In areas where a soil treatment/barrier termiticide treatment is required, FINACIDE LQ may be applied as a supplemental pretreatment to protect wood from subterranean termites that may penetrate chemical gaps occurring in termiticide-treated soil.
Finacide LQ is not a soil termiticide. Do not use to directly treat soil. When active infestations exist, get a professional inspection." Bold the last sentence, to permit this statement to be clearly visible as a new paragraph.
- e. **Delete** the following corresponding label sentence, since there are no allowable uses in areas where food may be exposed. "Do not apply in food serving areas while food is exposed."

- f. **Delete** the following corresponding label paragraph: "The use of this product in food processing establishments should be confined to time periods when the plant is not in operation. Foods should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. After treatment in food processing plants, thoroughly wash all equipment, benches, shelving, etc. where exposed food will be handled, with an effective cleaning compound and rinse with potable water." Refer to section 1.a. above for an explanation.
- g. **Replace** "including but not limited to the following varieties of" with including in the following statement: "and for wood-boring insects ~~including but not limited to the following varieties of~~ including termites, beetles and carpenter ants:

4. Page 4 of 11:

- a. Revise the following sentence as follows: "In addition, FINACIDE LQ will help prevent ~~infstations~~ infestations by other *listed* insect pests ~~such as~~ including cockroaches and silverfish.
- b. Revise the header "APPLICATION" to "**APPLICATION METHODS**"
- c. Remove the following text "A mixture of 1:1 or 1:2 dilution must be used within 24 hours. A 1:5 mixture may be used up to 30 days after mixing. Do not leave unused mixture in the spray tank over night." These statements imply that the applicator may leave diluted unidentified pesticide in containers from 1 to 30 days. This is not permissible within FIFRA.

5. Page 5 of 11:

- a. Table identified with Water: Finacide LQ: This corresponding label table needs to have an appropriate description: and each column must be identified as "Pests, Dilution, Remarks."
 - i. Remove the following row from the table:

Any insects or decay fungi	1:1	For application by spray, injection, roller or brush
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 - ii. Within the table cell with the following text: "Termites (subterranean, drywood, or Formosan)" insert "*Dampwood*" since this pest is identified in the listing.
 - iii. Within the table cell with the following text **revise** as follows: "For either remedial or preventive treatment, use the 1:1 dilution and apply by ~~spray~~ spray, brush or roller. 2:1 dilution ratio may be used for foam or mist treatment in voids."
 - iv. Within the table cell with the following text, revise as follows: "~~Drywood termites, powderpost beetles, decay fungi, and algae~~" These pests are listed in other cells in the table.
- b. **Remove** the corresponding label table entitled "DILUTION RATIOS BY MATERIAL TREATED" This entire table is confusing and misleading and contradicts language contained located in other areas of the directions for use.

6. Page 6 of 11:

- a. **Revise** the corresponding label paragraph as follows: "~~Prepare 1:2~~ An aqueous solution as stated above and add surfactant/ foaming agent. ~~Base the mixture of foaming agent and Finacide on experience and~~ Follow the instructions of the foaming agent and foam generating equipment (refer to the foam machine equipment manufacturer manuals and the surfactant's label for specific instructions) to produce a foam with sufficient firmness to persist on the treated surface for several minutes. FINACIDE LQ foam should be of a drier consistency (higher "expansion ratio") when used filling interior voids bordered by drywall than when treating an all-wood surface."

- b. **Revise** the corresponding paragraph as follows: "Dilute FINACIDE LQ according to the directions above. Treat infested wood by paintbrush or roller, spraying, and/or injecting the diluted FINACIDE LQ solution into beetle holes, termite and carpenter ant galleries ~~and decay pockets~~. Apply to the point of wetness to all infested and susceptible wood, being sure to thoroughly cover all infested areas. A second coat ~~should~~ *must* be applied to those wood members with only one or two exposed surfaces. ~~On~~ *In* heavily infested areas, a second coat, applied at least 20 minutes after the initial application, will be effective more rapidly.
- c. **Remove the dashes** after the numbers 8 and 10 in the corresponding label paragraph as follows: "If the infestation is not accessible from the surface, drill small holes into the wood in order to gain access to the infested area. Inject enough diluted solution to completely flood galleries or voids. Treat adjacent wood by injection of FINACIDE LQ dilution under pressure into holes drilled into the wood at 8 to 10 inch intervals. Inject at 40 psi for 4 to 6 seconds per hole."
- d. **Revise** the corresponding label paragraph as follows: "In basements and crawl spaces, apply one coat of FINACIDE LQ dilution to the point of wetness to all infested and susceptible wood surfaces including sill plates, piers, girders, subfloors, floor joists and any wood exposed to vertical access from the soil. **Note: Disodium octaborate treatments are not recommended for use on wood that remains in direct contact with soil.** On wood where access is limited to 1 or 2 sides of wood members, such as sills and plates on foundation walls, a second coat ~~should~~ *must* be applied 20 minutes after the first coat. Apply at a rate of ~~approximately~~ 1 gallon of FINACIDE LQ dilution per 200 square feet of floor area (400 square feet of wood surface area).
- e. **Revise** the corresponding label paragraph as follows: "Apply an additional treatment with a 1:1 dilution to crawlspace or basement interior surfaces of concrete, block, or brick. Use a rate of 1 gallon of dilution for approximately 400 square feet of surface. In crawl spaces, apply 2 feet up from ground level, and 6 inches in from the wall surface onto the slab. ~~For bath or other drain traps in slabs, gain access to the drain area, and evenly spray in ½ pint of the 1:1 dilution into the soil around the trap, then apply as above to the slab surface around the trap 1 foot out in all directions from the trap. Similarly treat all plumbing and utilities that penetrate or protrude from slabs or adjacent wood for a distance of at least 6 inches out from the penetration or protrusion, and 2 feet up on the plumbing or other utility surface.~~
- f. **Revise** the corresponding paragraph as follows: "Treat buildings on slabs by locating each stud and drilling a small hole through the wall covering adjacent to the side of each stud every 18-24 inches along its length to gain access to the infested area. Inject at least 1/3 fluid ounce of FINACIDE LQ dilution per hole. Drill at least one hole per stud bay near the floor in order to treat the base plate in each void. Treat entire wall areas as opposed to single stud bays in order to include the infested area completely within the treatment zone. ~~For bath or other drain traps in slabs, gain access to the drain area, and evenly spray in ½ pint of the 1:1 dilution into the soil around the trap, then apply as above to the slab surface around the trap 1 foot out in all directions from the trap. Similarly treat all plumbing and utilities that penetrate or protrude from slabs or adjacent wood for a distance of at least 6 inches out from the penetration or protrusion, and 2 feet up on the plumbing or other utility surface.~~

7. Page 7 of 11:

- a. **Revise** the corresponding paragraph as follows: "Voids, wall studs and wood members not otherwise accessible, may be treated by spraying or misting solution into voids and channels in damaged and suspected infested wood and/or through small holes drilled into walls and baseboard areas. It may be necessary to first remove or displace insulation, if present within the wall space. Drill holes no more than 24" 18" apart along each wood member to be treated. In addition, drill at least 1 hole mid-way between each pair of wall studs when treating base plates. Spray all areas to the point of wetness."
- b. **Revise** the corresponding subheader and bold text as follows: "**PRE-TREATMENT OF WOOD BEFORE/ DURING CONSTRUCTION**
For protection of wood from subterranean, Formosan, drywood and dampwood termites, carpenter ants, old house borers, powderpost and other listed wood boring beetles and wood decay fungi"
- c. **Move** the sentence to directly below the label sentence as shown below "DO NOT USE FINACIDE LQ IN THE STATE OF FLORIDA AS A PREVENTIVE TREATMENT AGAINST SUBTERRANEAN TERMITES IN NEW CONSTRUCTION:
For pretreatment of *wood in* homes or other wood-framed buildings under construction ~~for protection~~ against subterranean or Formosan termites ~~in new construction~~, use only the 1:1 dilution."

8. Page 8 of 11:

- a. **Revise** the corresponding label paragraph as follows: "Pretreatment *of wood* ~~should~~ *must* be done when access to wooden structural components is optimized, such as the "dried-in" stage when sheathing and roofing are in place, but before installation of insulation and wiring, plumbing, and other mechanical components."
- b. **Revise** the corresponding label paragraph as follows: "Apply to wetness (~~about~~ 1 gallon of solution or foam equivalent (i.e. the foam resulting from 1 gallon of solution) per 400 square feet of surface treated). Wood surfaces ~~should~~ *must* be free of any water-resistant cover. When spraying, apply as a coarse spray with low-pressure equipment. Finacide LQ is not intended for use a fine spray in low-volume or high pressure spray equipment. Brush or spray to wetness an uninterrupted band on all wood surfaces including base plates, sills, joists, studs, and subfloors, at least 2 feet up and 2 feet in from the base perimeter of the wood structure, ~~as well as all wood with vertical access to soil~~. Also treat all wood in a 2 foot band along planned or existing plumbing pipe routes in plumbing walls, and adjacent to cut-outs or conduits for plumbing, heating, wiring, or other mechanical components which may lead to contact with or proximity to soil. For wood where the 2 broadest surfaces are not both accessible, apply a second coating at least 20 to 30 minutes later. For voids where the interior is not accessible, drill small holes no more than 2 feet apart and spray into the interior, or better, fill the void with foam."
- c. **Revise** the corresponding label paragraph as follows: "Apply an additional treatment with a 1:1 dilution to crawlspace or basement interior surfaces of concrete, block, or brick. Use a rate of 1 gallon of dilution for approximately 400 square feet of surface. In crawl spaces, apply 2 feet up from ground level, and 6 inches in from the wall surface onto the slab. ~~For bath or other drain traps in slabs, gain access to the drain area, and evenly spray in 1/2 pint of the 1:1 dilution into the soil around the trap, then apply as above to the slab surface around the trap 1 foot out in all directions from the trap. Similarly treat all plumbing and utilities that penetrate or protrude from slabs or adjacent wood for a distance of at least 6~~

~~inches out from the penetration or protrusion, and 2 feet up on the plumbing or other utility surface.~~

- d. **Revise** the corresponding label paragraph as follows: "For optimal protection spray or brush all the wood surfaces of the entire first ~~storey~~ *story* of the framing, joists, and subfloors, and treat all exterior wood including siding, fascias, soffits, eaves, roofing, porches, decks and railings. Coated or painted wood may be treated by injection under pressure into holes drilled into the wood at 8- to 10- inch intervals. Inject at 40 psi for 4 to 6 seconds per hole."

9. Page 9 of 11:

- a. **Revise** the corresponding label paragraph as follows: "Treatment of thin exterior wood surfaces (less than two inches thick) Apply to exterior wood surfaces less than 2 inches thick, such as decks, sheds, siding, paneling, and fences only on bare wood, or wood surfaces where a paint, or water repellent stain, coating or finish is not present. ~~If necessary,~~ *s* Scrape and / or sand to remove *all* paint or finish prior to application. Prepare a 2:1 solution as described above and apply by spray, brush, or roller to the point of wetness to all wood surfaces. Apply a second coat at least 20 minutes later to heavily infested area, or where only 1 or 2 surfaces of wood members are accessible. Do not apply in rain or snow or when rain or snow is expected before at least 48 hours after treatment. If rain or snow occurs before 48 hours post-treatment, protect treated surfaces with a tarpaulin or other water-resistant cover."
- b. **Revise** the corresponding label section as follows: "Treatment of thick exterior wood (two or more inches thick) Apply to exterior wood surfaces less than 2 inches thick, such log buildings, timbers, beams, pilings or other exterior wood members two or more inches thick, only on bare wood, or wood surfaces where a paint, or water repellent stain, coating or finish is not present. ~~If necessary,~~ *s* Scrape and / or sand to remove paint or finish prior to application. ~~Interior, unfinished surfaces which have accumulated dirt or cooking oils should be cleaned with a strong detergent prior to treatment.~~ Prepare a 1:1 dilution as described above, and apply by spraying, brush, or roller to the point of wetness to all interior and exterior wood surfaces. Apply 2 coats to log ends, notches, corners and sill logs. Also, apply 2 coats to the surfaces of round logs 10" or greater in diameter, and rectangular logs 6" x 12" or larger. *Apply* A third coat ~~may be advisable~~ for very large logs, or logs with low porosity. Allow at least one hour between coats. Do not apply in rain or snow, or if rain or snow is expected within the following 48 hours. ~~Treated wood should not be exposed~~ *Do not expose* to rain or snow for at least 48 hours following treatment. In case rain or snow does occur, cover the treated wood with a tarpaulin or other water resistant cover."
- c. **Revise** the corresponding label section as follows: "Prepare a 5:1 dilution ~~as described above.~~ If lumber is bundled, use spacers to allow access to all surfaces of all pieces of wood. Completely submerge logs or lumber in the solution for at least 1 minute, or until all entrapped air has escaped. Treated wood ~~should~~ must not be exposed to rain or snow for at least 24 hours following treatment. In case rain or snow does occur, cover the treated wood with a tarpaulin or other water resistant cover."

10. Page 10 of 11:

- a. Revise the corresponding label section as follows: "FINACIDE LQ applied to surfaces in new construction or into voids in existing buildings will help prevent infestations by cockroaches and *silverfish* ~~other insect pests~~. Prepare a 1:1 dilution and apply at a rate of 1 gallon of dilution per 400 square feet of surface."
- b. Within the Storage and Disposal statement, revise the pesticide disposal statement as follows: "**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site *in accordance with the label directions*, or at an approved waste disposal facility."

If you have any questions, you may contact Melody Banks at (703)-305-5413.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosure

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FINACIDE LQ™

Wood Preservative / Insect Control

For the preservation, protection and preventative treatment or new construction pre-treatment of wood* against decay fungi and wood destroying insects and for remedial control of such pests in infested wood. For use indoors or outdoors.

** Also for wood-foam composite structural components.*

For use in and around houses, apartments, garages; warehouses; public and private institutions such as museums, schools, hotels, hospitals; farm buildings; animal quarters such as kennels, or stables; trucks and trailers; and food-handling establishments such as supermarkets, restaurants and food processing plants.

May be used on non-food contact surfaces in edible product areas of official establishments operating under the Meat, Poultry, Shell Egg Grading and Egg Products Inspection Programs.

ACTIVE INGREDIENT:

Disodium Octaborate Tetrahydrate 40.0% (by wt.)
(Na₂B₈O₁₃ • 4H₂O)

INERT INGREDIENTS: 60.0% (by wt.)

Total:..... 100.0% (by wt.)

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE INSIDE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 39578-3
EPA Est. No.: 39578-TX-1

Net Contents: XXXX

(For most applications, 1 gallon of concentrate covers approximately 800 square feet of wood surface)

Manufactured by:
Schirm USA, Inc.
2801 Oak Grove Road
Ennis, TX 75119

Product of Italy

ACCEPTED
with COMMENTS
to EPA Letter Dated
MAY 24 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the product
registered under EPA Reg. No.
39578-3

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FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling. Avoid contamination of food and feed. Do not leave container where children or animals may gain access.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Long sleeve shirt and long pants, shoes plus socks, protective eyewear, chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride or viton) and, in confined spaces, a respirator with an organic removing cartridge with a prefilter approved for pesticides (MSHA / NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge with any N, R, P or HE prefilter.

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.

FOR CHEMICAL EMERGENCY, SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT Call CHEMTREC - Day or Night: 1-800-424-9300 toll free in the continental U.S., Puerto Rico, or U.S. Virgin Islands. For calls originating elsewhere: 703-527-3887 (collect calls accepted). **Notice:** Read and understand the entire label before using. Use only according to label directions. Before buying or using this product, read **DISCLAIMER** and **LIMITED WARRANTY** statements found elsewhere on this label. If terms are unacceptable, return unopened package to seller for full refund of purchase price. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under the **DISCLAIMER** and **LIMITED WARRANTY**.

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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.

GENERAL INFORMATION

FINACIDE LQ is an inorganic borate salt, soluble in water, with insecticidal and fungicidal qualities effective against wood destroying organisms, including the target pests listed below. This product can be used as a remedial treatment of infested wood, and as a long-term protective or preventive treatment (before signs of infestations are observed) of wood in existing or new construction.

FINACIDE LQ is recommended for protection of all interior and exterior wood (including wood-foam composite structural components). Treatment is long lasting as long as the treated material is not exposed to rain, or continuous water or contact with the ground. For temporary protection of wood in contact with soil, see further instructions below. Types of materials that can be treated include, but are not limited to, all types of lumber, logs, plywood, particle board, paper, cardboard, etc. In addition, FINACIDE LQ may be applied to non-cellulose construction materials such as concrete, brick, metals, and plastic (e.g. plumbing pipe) as part of an application for prevention of termites. FINACIDE LQ should be applied only to bare, clean wood, plywood, particle board and other cellulosic materials where an intact water-repellent barrier such as paint, stain, or a sealer is not present.

Since FINACIDE LQ is applied directly to the wood, it can be used in areas where environmental contamination is of concern (nearby wells, cisterns, etc.). The active ingredient in FINACIDE LQ is an inorganic salt and once in place, it will not decompose or volatilize out of the wood. This product is toxic to wood destroying insects, however surface etching of treated wood by the target organisms may still occur. Older wood boring beetle larvae (particularly Old House Borers) already present in the wood at the time of treatment may occasionally emerge sometime after treatment. This will not occur frequently enough to cause structural damage to any wooden member.

FINACIDE LQ is not intended as a substitute for mechanical alteration, soil treatment or foundation treatment. Finacide LQ is not intended for application to soil. In areas where a soil treatment/barrier termiticide treatment is required, FINACIDE LQ may be applied as a supplemental pretreatment to protect wood from subterranean termites that may penetrate chemical gaps occurring in termiticide-treated soil. When active infestations exist, get a professional inspection.

When spraying overhead interior areas of homes, apartment buildings, etc. cover or protect all surfaces below the area being sprayed with plastic sheeting or other material which can be disposed of if contamination from dripping occurs. Do not apply in food serving areas while food is exposed.

The use of this product in food processing establishments should be confined to time periods when the plant is not in operation. Foods should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. After treatment in food processing plants, thoroughly wash all equipment, benches, shelving, etc. where exposed food will be handled, with an effective cleaning compound and rinse with potable water.

Since Finacide is water-soluble, soap and water is effective for clean up of tools and equipment, as well as washing up after use of the product.

TARGET ORGANISMS

FINACIDE LQ is effective for the treatment of wood (including wood-foam composite structural components) against:

- wood decay fungi, including brown (i.e. *Poria*), white and wet rots, and algae
- and for wood-boring insects including but not limited to the following varieties of termites, beetles and carpenter ants:

Subterranean termites

Reticulitermes

Heterotermes

Formosan Termites

Coptotermes

Drywood termites

Kaloterms

Incisitermes

Dampwood termites

Zootermopsis

Ambrosia beetles

Scolytidae

"False" powder post beetles

Bostrichidae

Furniture and deathwatch beetles

Anobiidae

Old house borers / Longhorn beetles

Cerambycidae

Powder post beetles

Lyctidae

Carpenter ants

Camponotus

In addition, FINACIDE LQ will help prevent infestations by other insect pests such as cockroaches and silverfish.

APPLICATION RATE FOR ALL WOOD SURFACES

Apply FINACIDE LQ diluted as described below to wetness but not runoff by spray or brush application. See specific directions for foam or injection.

SURFACE PREPARATION

Wood must be clean and bare: free of dirt, wax, and surface finishes. Remove all previous coatings or sealants. Remove surface mold or mildew prior to applying FINACIDE LQ. **Do not apply to frozen, cold or very hot wood. Surface temperature must be between 40° F and 90°F.**

APPLICATION

Applications of FINACIDE LQ may be used as a solution or foam. Solution may be applied by brush, spray, or dipping. When spraying, apply as a coarse spray with low-pressure equipment. Finacide LQ is not intended for use a fine spray in low-volume or high pressure spray equipment. Application of the solution may also be made by drilling and then injecting under pressure into sound wood or into the holes or galleries of infested wood. As foam, FINACIDE LQ may be applied directly to wood surfaces or injected into insect galleries or wall voids. See directions for **REMEDIAL AND PREVENTATIVE WOOD TREATMENTS** for detailed application instructions.

PREPARATION OF AQUEOUS TREATMENT SOLUTION

Shake container before use.

For use, FINACIDE LQ must be diluted in water at the concentrations described in the table below. Use of warm water will increase rate of dissolution. Use of an impeller - type mixer, such as those available for attachment to an electric drill, will also speed mixing.

To avoid blocking spray hoses when using a hand sprayer, mix in separate container then pour into spray tank. If this is not possible, be sure to add WARM water first, then add FINACIDE LQ while stirring or agitating, SLOWLY enough to be sure it is dissolving as it is added. Stir or agitate until FINACIDE LQ is completely dissolved in the water.

In high volume pumping systems, add the required volume of water to the tank first, start the circulation system, then slowly add FINACIDE LQ. Allow enough time for complete mixing before applying the mixture.

A mixture of 1:1 or 1:2 dilution must be used within 24 hours. A 1:5 mixture may be used up to 30 days after mixing. Do not leave unused mixture in the spray tank over night. Clean and flush lines and tanks with clean water after using this product.

DILUTION RATIOS BY TARGET PEST

Target Pests	Dilution Ratios (v/v)	Notes
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	Water: FINACIDE LQ	
Any insects or decay fungi	1:1	For application by spray, injection, roller or brush
Termites (subterranean, drywood, or Formosan)	1:1 or 2:1	For either remedial or preventive treatment, use the 1:1 dilution and apply by spay, brush or roller. 2:1 dilution ratio may be used for foam or mist treatment in voids.
Anobiid and lyctid powderpost beetles	1:1 or 2:1 5:1	Use a 2:1 dilution ratio for treating hardwood floors. Logs or wood over 4 inches thick require a 1:1 ratio. 5:1 dilution is for preventive treatment only
Old house borers and all other beetle species	1:1 or 5:1	Logs or wood over 4 inches thick require a 1:1 ratio. 5:1 dilution is for preventive treatment only in wood less than 4 inches thick.
Carpenter ants	1:1 or 2:1 5:1	For either remedial or preventive treatment, use the 1:1 dilution and apply by spay, brush or roller. 2:1 dilution ratio may be used for foam or mist treatment in voids. 5:1 dilution is for preventive treatment only, in wood less than 4 inches thick.
Decay fungi and algae	1:1 or 3:1 5:1	Use the 1:1 dilution if wood is ≥ 4 inches thick, or 3:1 if less than 4 inches thick. 5:1 dilution is for preventive treatment only, in wood less than 4 inches thick.
Drywood termites, powderpost beetles, decay fungi, and algae	5:1	Use this dilution for prevention only, not for remedial treatment. If sprayed, use 2 successive applications allowing to dry between applications. May also be used as a dip treatment (see below).

DILUTION RATIOS BY MATERIAL TREATED

Material treated	Dilution Ratios (V/V) Water: FINACIDE LQ	Notes
Logs, large beams and cut lumber	1:1	All insects and decay fungi
Decking, fences and plywood	2:1	For preventive treatment - not for remedial treatment. Use only on wood less than 2 inches thick
Logs, large beams and cut lumber	5:1	Dip treatment only.
Drywall (cellulose based), insulation	1:1 or 3:1	1:1 or 3:1 may be used for remediation of dry rot. 5:1 dilution is for preventive treatment only.

PREPARATION OF FOAM TREATMENT MIXTURE

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Prepare 1:2 aqueous solution as stated above and add surfactant/ foaming agent. Base the mixture of foaming agent and Finacide on experience and the instructions of the foaming agent and foam generating equipment (refer to the foam machine equipment manufacturer manuals and the surfactant's label for specific instructions) to produce a foam with sufficient firmness to persist on the treated surface for several minutes. FINACIDE LQ foam should be of a drier consistency (higher "expansion ratio") when used filling interior voids bordered by drywall than when treating an all-wood surface.

REMEDIAL TREATMENT FOR THE CONTROL OF EXISTING INFESTATIONS BY:

- Subterranean, Formosan, drywood and dampwood termites
- Carpenter ants
- Old house borers, powderpost and other wood boring beetles and
- Wood decay fungi and algae

Dilute FINACIDE LQ according to the directions above. Treat infested wood by paintbrush or roller, spraying, and/or injecting the diluted FINACIDE LQ solution into beetle holes, termite and carpenter ant galleries and decay pockets. Apply to the point of wetness to all infested and susceptible wood, being sure to thoroughly cover all infested areas. A second coat should be applied to those wood members with only one or two exposed surfaces. On heavily infested areas, a second coat, applied at least 20 minutes after the initial application, will be effective more rapidly.

If the infestation is not accessible from the surface, drill small holes into the wood in order to gain access to the infested area. Inject enough diluted solution to completely flood galleries or voids. Treat adjacent wood by injection of FINACIDE LQ dilution under pressure into holes drilled into the wood at 8- to 10- inch intervals. Inject at 40 psi for 4 to 6 seconds per hole.

In basements and crawl spaces, apply one coat of FINACIDE LQ dilution to the point of wetness to all infested and susceptible wood surfaces including sill plates, piers, girders, subfloors, floor joists and any wood exposed to vertical access from the soil. **Note: disodium octaborate treatments are not recommended for use on wood that remains in direct contact with soil.** On wood where access is limited to 1 or 2 sides of wood members, such as sills and plates on foundation walls, a second coat should be applied 20 minutes after the first coat. Apply at a rate of approximately 1 gallon of FINACIDE LQ dilution per 200 square feet of floor area (400 square feet of wood surface area).

Apply an additional treatment with a 1:1 dilution to crawlspace or basement interior surfaces of concrete, block, or brick. Use a rate of 1 gallon of dilution for approximately 400 square feet of surface. In crawl spaces, apply 2 feet up from ground level, and 6 inches in from the wall surface onto the slab. For bath or other drain traps in slabs, gain access to the drain area, and evenly spray in 1/2 pint of the 1:1 dilution into the soil around the trap, then apply as above to the slab surface around the trap 1 foot out in all directions from the trap. Similarly treat all plumbing and utilities that penetrate or protrude from slabs or adjacent wood for a distance of at least 6 inches out from the penetration or protrusion, and 2 feet up on the plumbing or other utility surface.

Treat buildings on slabs by locating each stud and drilling a small hole through the wall covering adjacent to the side of each stud every 18-24 inches along its length to gain access to the infested area. Inject at least 1/3 fluid ounce of FINACIDE LQ dilution per hole. Drill at least one hole per stud bay near the floor in order to treat the base plate in each void. Treat entire wall areas as opposed to single stud bays in order to include the infested area completely within the treatment zone. For bath or other drain traps in slabs, gain access to the drain area, and evenly spray in 1/2 pint of the 1:1 dilution into the soil around the trap, then apply as above to the slab surface around the trap 1 foot out in all directions from the trap. Similarly treat all plumbing and utilities that penetrate or protrude from slabs or adjacent wood for a distance of at least 6 inches out from the penetration or protrusion, and 2 feet up on the plumbing or other utility surface.

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On wood flooring, it will be necessary to remove any existing finish by complete coarse sanding or stripping prior to application. Dilute FINACIDE LQ to 2 parts water : 1 part Finacide LQ as described above, and apply by spray, paint brush, or roller at a rate of 1 gallon of dilution per 500 square feet of floor surface. For control of subterranean or Formosan termites, a second coat may be required. Wait one hour between coats. Allow floor to completely dry (maximum 10% moisture content) before refinishing. This will take at least 48 to 72 hours. Application of an aqueous solution such as FINACIDE LQ dilutions may raise the wood grain slightly. If so, a very light sanding should be done before applying a finish. FINACIDE LQ is compatible with most floor coatings, but it is recommended that a small section of floor is treated first to test for complete adhesion before the entire floor surface is refinshed.

NOTE: If the floor surface is still tacky or residue is evident after 72 hours of drying time, wash the floor with clean water and a mop, cloth or sponge, rinsing frequently. Allow to dry again, sand very lightly, and apply finish as above.

Voids, wall studs and wood members not otherwise accessible, may be treated by spraying or misting solution into voids and channels in damaged and suspected infested wood and/or through small holes drilled into walls and baseboard areas. It may be necessary to first remove or displace insulation, if present within the wall space. Drill holes no more than 24" apart along each wood member to be treated. In addition, drill at least 1 hole mid-way between each pair of wall studs when treating base plates. Spray all areas to the point of wetness.

Foam applications:

Prepare the foam solution as described above.

Apply foamed FINACIDE LQ dilution to void spaces such that one gallon of the diluted mixture will expand with foaming agent to produce a foam with sufficient firmness to stay in place while soaking into wood. A drier foam is preferred when treating voids lined with drywall. Apply enough foam to contact all wood surfaces and completely fill the void space.

Foam insulation may be treated by injection of a dilution of 2 parts water : 1 part FINACIDE LQ into the infested area and/or low pressure surface spraying at a rate of one 1 gallon of this dilution per 300 to 400 square feet.

For foam insulation materials with closed cell structures which do not allow significant penetration from surface application, such as polyisocyanurate and extruded polystyrene, surface spraying will not be sufficient with these types of insulation, and injection is also required.

PRE-TREATMENT OF WOOD BEFORE/ DURING CONSTRUCTION

For protection from subterranean, Formosan, drywood and dampwood termites, carpenter ants, old house borers, powderpost and other wood boring beetles and wood decay fungi

Finacide LQ is not intended for application to soil and is not a substitute for mechanical alteration, soil treatment or foundation treatment. Finacide LQ provides only limited and temporary protection of wood in contact with ground (see specific instructions), and is not a substitute for products registered for protection of wood in contact with ground.

DO NOT USE FINACIDE LQ IN THE STATE OF FLORIDA AS A PREVENTIVE TREATMENT AGAINST SUBTERRANEAN TERMITES IN NEW CONSTRUCTION

In areas where a soil treatment/barrier termiticide treatment is required, FINACIDE LQ may be applied as a supplemental pretreatment to protect wood from Formosan and subterranean termites that may penetrate chemical gaps occurring in termiticide-treated soil, and may increase resistance to attack by drywood and dampwood termites; carpenter ants; old house borers; powderpost and other wood-boring beetles; and wood decay fungi.

For pretreatment of homes or other wood-framed buildings under construction for protection against subterranean or Formosan termites in new construction, use only the 1:1 dilution. Do not use Finacide LQ for new construction where the total length of wood or wood fiber-based is less

than 60% of the total length of base plates including interior and exterior walls. If there is not a continuous wood surface on every exterior wall, also apply FINACIDE LQ to all other exterior surfaces such as concrete, block, brick, or stone to at least 2 feet above ground level, and extended onto the slab for 4 to 8 inches.

Pretreatment should be done when access to wooden structural components is optimized, such as the "dried-in" stage when sheathing and roofing are in place, but before installation of insulation and wiring, plumbing, and other mechanical components.

Follow the instructions below for all buildings under construction, including those on crawlspaces, basements, or slabs.

Prepare a 1:1 solution as described above in **PREPARATION OF AQUEOUS TREATMENT SOLUTION** section, or prepare foam as described above in **PREPARATION OF FOAM TREATMENT MIXTURE** section.

Apply to wetness (about 1 gallon of solution or foam equivalent (i.e. the foam resulting from 1 gallon of solution) per 400 square feet of surface treated). Wood surfaces should be free of any water-resistant cover. When spraying, apply as a coarse spray with low-pressure equipment. Finacide LQ is not intended for use a fine spray in low-volume or high pressure spray equipment. Brush or spray to wetness an uninterrupted band on all wood surfaces including base plates, sills, joists, studs, and subfloors, at least 2 feet up and 2 feet in from the base perimeter of the wood structure, as well as all wood with vertical access to soil. Also treat all wood in a 2 foot band along planned or existing plumbing pipe routes in plumbing walls, and adjacent to cut-outs or conduits for plumbing, heating, wiring, or other mechanical components which may lead to contact with or proximity to soil. For wood where the 2 broadest surfaces are not both accessible, apply a second coating at least 20 to 30 minutes later. For voids where the interior is not accessible, drill small holes no more than 2 feet apart and spray into the interior, or better, fill the void with foam.

Apply an additional treatment with a 1:1 dilution to crawlspace or basement interior surfaces of concrete, block, or brick. Use a rate of 1 gallon of dilution for approximately 400 square feet of surface. In crawl spaces, apply 2 feet up from ground level, and 6 inches in from the wall surface onto the slab. For bath or other drain traps in slabs, gain access to the drain area, and evenly spray in 1/2 pint of the 1:1 dilution into the soil around the trap, then apply as above to the slab surface around the trap 1 foot out in all directions from the trap. Similarly treat all plumbing and utilities that penetrate or protrude from slabs or adjacent wood for a distance of at least 6 inches out from the penetration or protrusion, and 2 feet up on the plumbing or other utility surface.

For optimal protection spray or brush all the wood surfaces of the entire first storey of the framing, joists, and subfloors, and treat all exterior wood including siding, fascias, soffits, eaves, roofing, porches, decks and railings. Coated or painted wood may be treated by injection under pressure into holes drilled into the wood at 8- to 10- inch intervals. Inject at 40 psi for 4 to 6 seconds per hole.

Foam insulation may be treated by injection of a dilution of 2 parts water : 1 part FINACIDE LQ into the infested area and/or low pressure surface spraying at a rate of one 1 gallon of this dilution per 300 to 400 square feet.

For foam insulation materials with closed cell structures which do not allow significant penetration from surface application, such as polyisocyanurate and extruded polystyrene, surface spraying will not be sufficient with these types of insulation, and injection is also required.

TREATMENT FOR PREVENTION OF DRYWOOD TERMITES AND POWDERPOST BEETLES

Prepare a 5:1 dilution as described above, and apply 2 successive coats to the point of wetness by spray, paint brush or roller to all wood surfaces. Wait at least 20 minutes between applications.

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TREATMENT OF EXTERIOR WOOD

Wood in contact with ground

Disodium octaborate products such as FINACIDE have very limited lifespan of effectiveness for wood in contact with the ground. If treatment of wood in contact with the ground with FINACIDE LQ is desired, periodic reapplication will be needed, based on inspection of the wood.

Treatment of thin exterior wood surfaces (less than two inches thick)

Apply to exterior wood surfaces less than 2 inches thick, such as decks, sheds, siding, paneling, and fences only on bare wood, or wood surfaces where a paint, or water repellent stain, coating or finish is not present. If necessary, scrape and / or sand to remove paint or finish prior to application. Prepare a 2:1 solution as described above and apply by spray, brush, or roller to the point of wetness to all wood surfaces. Apply a second coat at least 20 minutes later to heavily infested area, or where only 1 or 2 surfaces of wood members are accessible. Do not apply in rain or snow or when rain or snow is expected before at least 48 hours after treatment. If rain or snow occurs before 48 hours post-treatment, protect treated surfaces with a tarpaulin or other water-resistant cover.

Treatment of thick exterior wood (two or more inches thick)

Apply to exterior wood surfaces less than 2 inches thick, such log buildings, timbers, beams, pilings or other exterior wood members two or more inches thick, only on bare wood, or wood surfaces where a paint, or water repellent stain, coating or finish is not present. If necessary, scrape and / or sand to remove paint or finish prior to application. Interior, unfinished surfaces which have accumulated dirt or cooking oils should be cleaned with a strong detergent prior to treatment. Prepare a 1:1 dilution as described above, and apply by spraying, brush, or roller to the point of wetness to all interior and exterior wood surfaces.

Apply 2 coats to log ends, notches, corners and sill logs. Also, apply 2 coats to the surfaces of round logs 10" or greater in diameter, and rectangular logs 6" x 12" or larger. A third coat may be advisable for very large logs, or logs with low porosity. Allow at least one hour between coats. Do not apply in rain or snow, or if rain or snow is expected within the following 48 hours. Treated wood should not be exposed to rain or snow for at least 48 hours following treatment. In case rain or snow does occur, cover the treated wood with a tarpaulin or other water resistant cover.

Finishing Exterior Wood for Long Term Protection:

Exterior wood surfaces which have been treated with FINACIDE LQ will require surface coating with a water-resistant finish such as paint, varnish or exterior stain in order to maintain long-term protection. Allow the wood to completely dry following treatment (at least 48 hours after treatment or precipitation) and within 6 weeks after treatment. FINACIDE LQ will not interact with most finishes, but to ensure compatibility, test coat a small section of treated wood with the finish to be used.

DIP TREATMENT FOR LOGS OR LUMBER

Prepare a 5:1 dilution as described above.

If lumber is bundled, use spacers to allow access to all surfaces of all pieces of wood. Completely submerge logs or lumber in the solution for at least 1 minute, or until all entrapped air has escaped. Treated wood should not be exposed to rain or snow for at least 24 hours following treatment. In case rain or snow does occur, cover the treated wood with a tarpaulin or other water resistant cover.

REMEDIAL OR PREVENTIVE TREATMENT OF ALGAE

Drywall or cellulose insulation

FINAIDE LQ will prevent or remediate growth of algae on drywall and cellulose insulation.

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Surfaces must be free of water repellent barriers such as paint, stain, or sealer. Spray or paint onto the back paper surface only of drywall. Refer to the rate tables above for the appropriate dilution, and apply 1 gallon of dilution per 400 square feet of surface. If drywall is installed, and insulation is enclosed, use a mist generator to spray into the voids.

GENERAL PEST CONTROL

FINACIDE LQ applied to surfaces in new construction or into voids in existing buildings will help prevent infestations by cockroaches and other insect pests. Prepare a 1:1 dilution and apply at a rate of 1 gallon of dilution per 400 square feet of surface.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a dry place. Do not store where children or animals may gain access. After prolonged storage shake container before opening and mixing.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

For Paper or Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

For Plastic Containers: Do not reuse empty container. Triple rinse container, then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

For Mini-bulk Refillable Containers: Return to Schirm USA, Inc. If not returned or refilled, do not reuse container. Triple rinse, then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DISCLAIMER

IMPORTANT:

Read the entire Label including this disclaimer, Risks of Using this product, Limited Warranty, and Limitation of Liability before using this product.

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label instructions. Because of many varying conditions affecting use and application, manufacturer warns complete prevention of insect infestation, algae, fungi or other organisms is not guaranteed.

Neither manufacturer nor seller shall be liable in respect to any injury or damages suffered by reason of the use of this product for a purpose not indicated by the label, or when used contrary to the directions or instructions herein, nor with respect to breach of any warranty not expressly specified herein.

Buyer assumes all risks associated with the use of this product in any manner or under conditions not specifically directed or approved on the label.

LIMITED WARRANTY

Schirm warrants only that this product conforms to the description on the label and is reasonably fit for the purpose stated in the label, under average use conditions, when used strictly in accordance with the label. Neither Schirm USA Inc. nor its supplemental distributors make any other express or implied warranty of fitness for any particular purpose or of

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