APR | 5 1997

Dussek Campbell Limited P.O. Box 385 30 Dussek Street Belleville, Ontario K8N 5A5

Attention: Mike Hewitt

Subject:

Copper Naphthenate

EPA Registration Number 43437-4 Your Submission Dated April 9, 1997

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.

Revise the Environmental Hazards to read as follows:

"This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA".

A stamped copy of your labeling is enclosed for your records. Submit one (1) copy of the final printed label prior to release of the product for shipment.

If you have any questions concerning this letter, please contact Delores Williams at (703) 308-6372.

Sincerely.

Robert S. Brennis

Acting Product Manager (32)

Regulatory Management Branch II

Antimicrobials Division (7504C)

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Printed on Recycled Paper

COPPER NAPHTHENATE

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if swallowed or absorbed through the skin. Causes substantial but temporary eye and skin irritation. Do not get in eyes or on skin or on clothing. Remove contaminated clothing and wash before reuse. Prolonged or repeated skin contact may cause allergic reaction in some individuals.

Do not breathe vapors or mist during brush, roll, spray or dip applications. Wear a NIOSH/MHSA approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of this product.

In case of medical questions, emergencies or accidents involving this product, call CHEMTREC at 1-800-424-9300. For general information, questions or comments about this product, call Dussek Campbell Ltd. collect at (613) 966-8881.

Application of this product may produce a strong, lingering, unpleasent odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, in areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters. 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 EPA Office.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame. Use with adequate ventilation. Avoid breathing vapors.

STATEMENTS OF PRACTICAL TREATMENT

- If swallowed, do not induce vomiting. Call physician immediately.
- If splashed in eyes, flush with clean water for 15 minutes and contact a physician.
- In case of skin contact, remove the product from the skin promptly by washing with vegetable oil or hand degreaser and then with soap
- If inhaled, remove to fresh air. Restore breathing if necessary...

STORAGE AND DISPOSAL

Storage: Store in a cool, well ventilated area away from sources of ignition.

Pesticide Disposal: Rinse the emptied container thoroughly and use the rinsings for treatment. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal site.

Container Disposal: Triple rinse and offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by state or local authorities.

Prohibitions: Do not contaminate water, food or feed by storage or

PRESERVATIVE FOR TEXTILES AND WOOD FOR EXTERIOR USE ONLY

Products formulated or repackaged from this product must be labeled for "Exterior Use Only" and must bear all the statements listed under the section entitled Precautionary Statements including the CHEMTREC number. The Dussek Campbell Ltd. number must be replaced by the reformulators or repackagers 1-800-number or a collect number.

Active Ingredient: Copper Naphthenate*		89%
Inert Ingredient: Total		$\frac{11\%}{100\%}$
*Copper as metal	• • • • • • • • • • • • • • • • •	8%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

EPA Reg. No. EPA Est. No.

Net Weight: 200 kg. 441 lbs.

Under the recoral Insecticide, Funcicide, and Redenticide Act as amended to U esticide register. 1 and . " ii'⊎i No



Dussek Campbell Limited A Burmah Castrol Company

PO Box 385, 30 Dussek Street Belleville, Ontario K8N 5A5

DIRECTIONS FOR USE:

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

Do not apply where the preservative may contaminate food, feed or drinking water.

PRESERVATIVE FOR WOOD:

This preservative protects wood against fungal rot, decay, termites and wood-boring insects and is used for treatment of wood in ground contact and also for above ground uses, Do not apply to logs used in the construction of log homes or for any interior application.

Dussek Campbell's 8% Copper Naphthenate complies with the preservative standards as issued in the AWPA Book of Standards. 8% Copper Naphthenate is a concentrate solution of Copper Naphthenate which should be diluted with suitable organic solvents such as petroleum hydrocarbons. It can be applied to wood such as utility poles, fence posts, cross ties, patio decking, millwork, landscape logs and timber, decking, greenhouse wood and stakes, bridge timber and other similar items.

TREATMENT BY PRESSURE, VACUUM OR THERMAL METHODS:

Blend one (1) part by volume of 8% Copper Naphthenate with (7) parts by volume of Aliphatic Hydrocarbon Reducing Solvent. A Copper solution of 0.5% to 1.5% is recommended. Full details are provided in the AWPA standards regarding desired retention levels and proper pressure treatment methods for different wood species. AWPA Book of Standards should be consulted for recommended dilution concentration for each wood species. Use of this product in industrial settings requires adequate engineered ventilation and containment in the treating area and in the area where wood is dried.

TREATMENT BY DIPPING, BRUSHING OR ROLLING:

Blend one (1) part by volume of 8% Copper Naphthenate with (3) parts by volume of Aliphatic Hydrocarbon Reducing Solvent when applying to wood such as fence posts, patio decking, ladders, millwork, greenhouse benches and similar items. The recommended application rate is 100 to 300 square feet per gallon. Lumber and other structural members not to be placed in contact with soil should be immersed for a period of 3 minutes per inch of thickness or receive two or more coats by brush or spray. All lumber to be treated should be free of bark, dry and well seasoned. After treatment the wood should be drained of excess solution and allowed to air dry until all solvent has evaporated and the wood is free of solvent odor.

PRESERVATIVE FOR TEXTILES:

8% Copper Naphthenate is used to control rot and mildew in heavy duty textiles. For industrial duck, tents, truck and boat covers, rope and other non-rubber fabrics it is recommended that 0.8% to 1.2% Copper by weight be deposited in the treated fabric. Deposition depends on severity of exposure and degree of protection required. The preservative is normally applied in combination with waterproofing, fire retardants and pigments.