

51578-1

06/09/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

June 9, 2005

Wendy A. McCombie  
Agent for AMTECO, Inc.  
Lewis & Harrison  
122 C Street, N.W.  
Suite 740  
Washington, DC 20001

Subject: T.W.P. Total Wood Preservative - 100 Clear  
EPA Registration Number 51578-1  
Application Date: May 19, 2005  
EPA Received Date: March 20, 2005

Dear Ms. McCombie:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

**Proposed Notification**

- Addition of the California Prop 65 statement "This product contains a chemical known to the State of California to cause cancer." to the product label

**General Comments**

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,

Adam Heyward  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510-C)

**CONCURRENCES**

SYMBOL	IS/OC						
URNAM	Ray						
DATE	6-9-05						

34

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# LEWIS & HARRISON

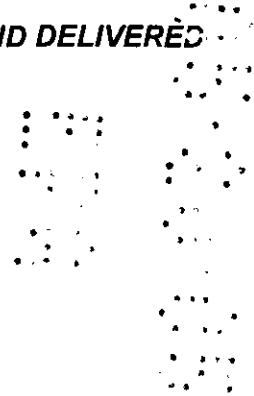
Consultants In Government Affairs

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

19 May 2005

**HAND DELIVERED**

Document Processing Desk [NOTIFY]  
Office of Pesticide Programs (7504C)  
Antimicrobials Division  
US Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202



**ATTENTION: Mr. Adam Heyward**  
**Product Manager, Team 34**

**SUBJECT: AMTECO, Inc.**  
**TWP® Total Wood Preservative (EPA Reg. No. 51578-1)**  
**Notification of Minor Label Changes per PR Notice 98-10**  
**Addition of California Prop 65 Statement**

Dear Mr. Heyward:

On behalf of AMTECO, Inc., we are submitting an application to notify the Agency of a minor label change for **TWP® Total Wood Preservative (EPA Reg. No. 51578-1)**, in accordance with the provisions of PR Notice 98-10.

The minor label change involves adding the California Prop 65 statement, "This product contains a chemical known to the State of California to cause cancer."

No other changes have been made to the product label.

To support this Notification for **TWP Total Wood Preservative**, we are submitting the following documents:

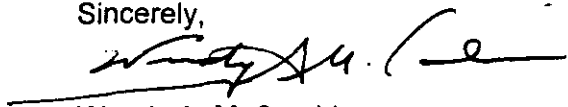
- 1) Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) Two (2) copies of the revised product label; and,
- 3) One (1) copy of the revised product label with the change highlighted.

Insofar as Lewis & Harrison is acting as the "Company Contact" and "Company Agent" for AMTECO, Inc., please direct all correspondence directly to us at **122 C Street NW, Suite 740, Washington, DC 20001**. If you have any questions, please contact me by telephone at 202-393-3903 ext 13 or by e-mail at [wmccombie@lewisharrison.com](mailto:wmccombie@lewisharrison.com).

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Thank you very much for your attention to this matter.

Sincerely,



Wendy A. McCombie  
Agent for,  
AMTECO, Inc.

WAM/wm

Enclosures (3)

CC: Sandra Boewer (AMTECO, Inc.)





United States  
Environmental Protection Agency  
Washington, DC 20460

- Registration
- Amendment
- Other (Notification)

OPP Identifier Number  
265394

**Application for Pesticide - Section I**

1. Company/Product Number <b>51578-1</b>	2. EPA Product Manager <b>Adam Heyward</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>TWP® Total Wood Preservative</b>	PM# <b>Team 34</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>AMTECO, Inc. PO Box 9, 1100 Jefferson Drive Pacific, MO 63069</b> <b><u>PLEASE SEND ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

- Amendment - Explain below.
- Resubmission in response to Agency letter dated \_\_\_\_\_
- Notification - Explain below.
- Final printed labels in response to Agency letter dated \_\_\_\_\_
- "Me Too" Application
- 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 98-10: California Prop 65 Statement**

*This notification is consistent with the provisions of PR Notice 98-10 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 98-10 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.*

Signature: *Wendy A. McCombie* Date: 19 MAY 2005

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input 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 <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

**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> <b>122 C St. NW Suite 740, Washington DC 20001</b>	Title <b>Agent for AMTECO, Inc.</b>	Telephone No. (include Area Code) <b>202-393-3903 ext. 13</b>
<b>Certification</b> 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 <b>(Stamped)</b>
Signature <u><i>Wendy A. McCombie</i></u>	3. Title <b>Agent for AMTECO, Inc.</b>	
4. Typed Name <b>Wendy A. McCombie, Lewis &amp; Harrison</b>	5. Date <b>19 May 2005</b>	

EASY APPLICATION • REPELS WATER LEAKAGE • IMPROVES COLOR • FORMULATION • MILDREW RESISTANT • PREVENTS WOOD ROT

# TWP

## TOTAL\* WOOD PRESERVATIVE

\*Total Wood Preservative (TWP) provides a broad spectrum of wood protection from mildew and fungus attack, aging and weathering. TWP® is water repellent and aids in color retention.

### PRESERVES NATURAL WOOD COLOR

[Color Number and Description, e.g. 100 Clear]  
 [ONE GALLON (3.785 LITERS)] [FIVE GALLON (18.925 LITERS)]

Use Total Wood Preservative for these applications:

- ROUGH SAWN CEDAR
- WOOD SIDING
- PORCH DECKING
- FENCES
- WOOD SHINGLES
- SHAKES
- SHUTTERS
- FACIA

KEEP OUT REACH OF CHILDREN <b>CAUTION</b>  COMBUSTIBLE LIQUID AND VAPOR See Back Panel For Additional Precautionary Statements	<b>ACTIVE INGREDIENTS</b> 3-Iodo-2-Propynyl Butyl Carbamate..... 0.58% INERT INGREDIENTS..... 98.42% TOTAL..... 100.00%
	Contains Petroleum Distillates

This product contains a chemical known to the State of California to cause cancer.



H-2
F-2
R-O
PP-G

EPA Reg. No. 51578-1  
 EPA Est. No. 51578-MO-1

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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION.** Avoid contact with skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>

In case of emergency call toll free: 1-800-424-9300

**NOTE TO PHYSICIAN:** May pose an aspiration pneumonia hazard. Contains petroleum distillates.

**PPE FOR COMMERCIAL USERS**

Applicators and other handlers must wear:

- long-sleeved shirt and long pants
- chemical resistant gloves (such as barrier laminate, nitrile rubber, neoprene rubber and viton)
- shoes plus socks

Follow manufacturers' instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS**

**Residential Users should:**

- remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**Commercial Users should:**

- wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- remove personnel protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly.

**ENVIRONMENTAL HAZARDS**

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

**PHYSICAL AND CHEMICAL HAZARDS**

**COMBUSTIBLE!** Do not use, store, pour or spill near heat, sparks or open flame. Keep away from heat. In case of fire use water spray, foam carbon dioxide or dry chemical.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Do not expose this product to excessive heat or cold. Store in sealed metal containers. Close container after each use.

**DISPOSAL: Residential Users-** Do not reuse container. Securely wrap original container in several layers of newspaper and discard in trash. **Commercial Users-** 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: 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.

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. **DO NOT MIX THIS PRODUCT WITH OTHER PRODUCTS.** It is essential that you consult the Material Safety Data Sheet (MSDS) describing the product as well as known possible hazards. If you do not have one, ask your sales representative to provide one for you.

**GENERAL PRECAUTIONS AND RESTRICTIONS**

**Residential Users:** Do not apply this product in a way that will contact any person or pet.

**Commercial Users:** Do not apply this product in a way that will contact workers or other persons.

This product is for exterior use only and is not intended for use in direct contact with soil. TWP is not intended for the control of termites or other wood destroying insects. TWP is not re-tintable nor intended for below ground use. Do not apply below 50 °F. Avoid foliage during application.

**DO NOT THIN TWP.**

**IMPORTANT! RAGS, STEEL WOOL OR WASTE SOAKED WITH THIS PRODUCT MAY SPONTANEOUSLY CATCH FIRE IF IMPROPERLY STORED OR DISCARDED. IMMEDIATELY AFTER USE, PLACE RAGS, STEEL WOOL OR WASTE IN A SEALED WATER-FILLED METAL CONTAINER.**

**GENERAL INFORMATION**

TWP protects wood substances from premature loss of color, water rot, surface mildew, and water absorption. The product contains ultraviolet inhibitors to prevent natural graying of wood.

TWP may be intermixed with other TWP colors. TWP is available in 100 Clear, 101 Cedartone, 102 Redwood, 103 Dark Oak, 104 Black Walnut, 105 Cape Cod Gray, and 106 Prairie Gray. TWP 100 Clear is intended for exterior use only and does not include ultraviolet protection from weathering. Due to variation of base wood color, finish color may vary. **CHECK COLOR BY APPLYING SAMPLE OF PRODUCT TO DETERMINE DESIRED EFFECT.** Because horizontal surfaces are subject to harsher conditions (foot traffic, standing water, deck furniture, spills, etc.) than vertical surface, we cannot guarantee color retention. Apply color maintenance coats as needed.

TWP is designed for application on clean wood surfaces. Applying this product over a sealed surface will result in a glossy film. TWP will function best if old finish is removed.

**APPLICATION INSTRUCTIONS**

**New Wood:** Rough sawn surfaces must complete 4 cycles of water soaking and thorough drying before finish application. Use Gemini's Wood Prep as per label instructions. Allow a minimum of 48 hours after last exposure to moisture for substrate to thoroughly dry.

**Pressure-Treated Wood:** Use Gemini's Wood Prep as per label instructions. Allow a minimum of 7 days after last exposure to moisture for substrate to thoroughly dry. Wet shipped pressure treated wood should be allowed 12 month natural weathering before finish coat application.

**Old Wood:** Unprotected old wood is typically various shades of gray to black. This is due to mildew and ultraviolet light attack on the wood surface. To treat this type of surface, apply Gemini's Wood Brightener Plus or Gemini's Wood Brightener for Cedar and Redwood per label instructions. After use, pressure wash as recommended and allow to dry for 48 hours.

**Previously Stained Wood:** Apply Gemini's Injectable Safe Strip per label instructions to remove oil-based and water-based stains and sealers.

**Spread Rate:** Apply 200 - 400 sq. ft./gal. Rate will vary depending upon wood porosity. Two uniform coats achieve the best results. Follow first saturation coat with moderate to thin second coat to prevent excessive surface build. TWP must not be allowed to puddle on surface as excess film build will appear shiny and cause failure. A second coat, if desired, must be applied immediately after the first coat.

**Method of Application:** Use brush, roller or spray. Use Mineral Spirits for equipment cleanup. **DO NOT THIN TWP.**

**MIX THOROUGHLY BEFORE USING AND OCCASIONALLY DURING USE.**

**MAXIMUM V.O.C. 550 grams/liter or less**

**Customer Satisfaction Guarantee:** If not satisfied with this product when applied according to label directions, additional product will be provided or your purchase price will be refunded. Amteco Inc. accepts no responsibility in regards to any labor claims.

Contains/CAS#: Mineral Spirits/8052-41-3, Petroleum Hydrocarbons/6472-47-8, Ethyl Benzene/100-41-4

**Manufactured by: AMTECO, INC., PO Box 9, Pacific, MO 63069 1-800-969-4811**  
Emergency (Chemtrec) 800-424-9300  
TWP is a registered trademark of Amteco, Inc.

*W/O*