

51578-1

06/17/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUN 17 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Christina M. Swick  
**AMTECO, Inc.**  
P.O. Box 9  
1100 Jefferson Drive  
Pacific, MO 63069

Subject: **TWP® Total Wood Preservative**  
EPA Registration No.: 51578-1  
Application Date: May 19, 2010  
Receipt Date: May 21, 2010

Dear Ms. Swick:

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

**Proposed Notification:**

Label Amendment: Update per PRN 2007-4

**General Comment:**

Based on a review of the material submitted, your notification to update your label per PRN 2007-4, is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

**CONCURRENCES**

SYMBOL							
SURNAME							
DATE							



United States  
Environmental Protection Agency  
Washington, DC 20460

- Registration
- Amendment
- Other NOTIFICATION

OPP Identifier Number

**Application for Pesticide – Section I**

1. Company/Product Number <b>51578-1</b>	2. EPA Product Manager <b>Jaqueline Campbell-McFarlane</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>34</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>AMTECO, Inc.</b> <b>PO Box 9, 1100 Jefferson Drive</b> <b>Pacific, MO 63069</b> <b>PLEASE SEND ALL CORRESPONDENCE TO</b> <b>"CONTACT POINT" LISTED BELOW</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**

<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 LABEL CHANGE PER PR NOTICE 2007-4**

*This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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: Christina M. Swick

Date: 5/19/10

**THIS SUBMISSION IS NOT SUBJECT TO PRIA FEES**

**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <b>1 gallon &amp; 5 gallons</b>		5. Location of Label Directions <input checked="" 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"/> Other _____ <input checked="" type="checkbox"/> Paper glued <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>Christina M. Swick, Lewis &amp; Harrison</b> <b>122 C Street, NW, Suite 740, Washington DC 20001</b>	Title <b>Agent</b>	Telephone No. (include Area Code) <b>202-393-3903 x16</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 (Stamped)
2. Signature <u>Christina M. Swick</u>	3. Title <b>Agent</b>		
4. Typed Name <b>Christina M. Swick, Lewis &amp; Harrison, LLC</b>	5. Date <b>May 19, 2010</b>		

# 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

May 19, 2010

**HAND DELIVERED**

Antimicrobials Division (Mail Code 7504P)  
Office of Pesticide Programs  
Document Processing Desk [NOTIFY]  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**ATTN: Jaqueline Campbell-McFarlane  
Product Manager, Team 34**

**SUBJECT: AMTECO, Inc.  
TWP® Total Wood Preservative (EPA Reg. No. 51578-1)  
Notification of Label Changes per PR Notice 2007-4**

Dear Ms. Campbell-McFarlane:

On behalf of AMTECO, Inc., we are notifying the Agency of changes to the *TWP® Total Wood Preservative* label. The changes are in accordance with PR Notice 2007-4. All of the language has been added verbatim from the aforementioned PR Notice. No other changes have been made to the label.

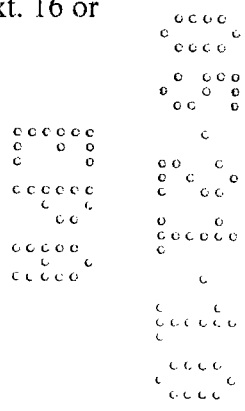
Please find enclosed the following documents to support this notification:

- 1) Pesticide Application Form;
- 2) One (1) copy of the proposed product label with the changes marked; and,
- 3) Three (3) copies of the proposed product label.

If you have any questions or comments, please contact me at 202-393-3903 ext. 16 or [cswick@lewisharrison.com](mailto:cswick@lewisharrison.com).

Sincerely,

Christina M. Swick  
Agent for AMTECO, Inc.



# 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

EASY APPLICATION • REPELS WATER LONGER • IMPROVED FORMULATION • MILDEW RESISTANT  
• PREVENTS WOOD ROT

Use Total Wood Preservative for these applications:

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

### ACTIVE INGREDIENTS

3-Iodo-2-Propynyl Butyl Carbamate.....	0.58%
INERT INGREDIENTS.....	99.42%
TOTAL.....	100.00%

Contains Petroleum Distillates

KEEP OUT REACH OF CHILDREN

## CAUTION

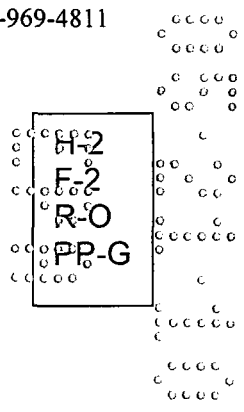
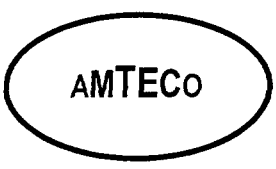
COMBUSTIBLE LIQUID AND VAPOR  
See Back Panel For Additional  
Precautionary Statements

**NOTIFICATION**  
 Date Reviewed: 6/17/2010  
 Reviewed By: *Stacey Grubby*

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

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.

EPA Reg. No. 51578-1  
EPA Est. No.  
[Color Number and Description:]  
[ONE GALLON (3.785 LITERS)]  
[FIVE GALLON (18.925 LITERS)]



Note to Reviewer: Language in [ ] is optional or interchangeable

**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.

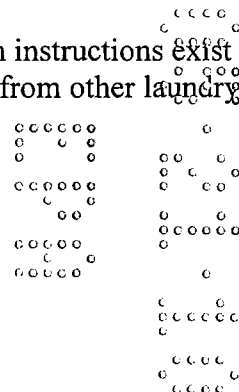
<b>FIRST AID</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, 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 OR CLOTHING:</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	
<b>NOTE TO PHYSICIAN:</b> 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.



*Note to Reviewer: Language in [ ] is optional or interchangeable*

**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.

**GENERAL PRECAUTIONS AND RESTRICTIONS**

Do not allow this product to contact any person or pet during application. TWP is for exterior use only and is not intended for use below ground or in direct contact with soil. TWP is not intended for the control of termites or other wood destroying insects. Only apply when temperature is 50-90° F. Keep TWP off foliage, concrete, stone, glass, siding, or any other surface where stain is not desired.

**DO NOT THIN OR TINT TWP. DO NOT APPLY TWP TO SEALED OR WET WOOD.**

**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.**

**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-** Nonrefillable container. Do not reuse or refill this container. Securely wrap original container in several layers of newspaper and discard in trash or offer for recycling if available. **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:** Nonrefillable container. Do not reuse or refill this container. 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

*Note to Reviewer: Language in [ ] is optional or interchangeable*

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

BEFORE USING THIS PRODUCT 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 INFORMATION**

TWP protects exterior wood from premature loss of color, rot, surface mildew, and water absorption. TWP is available in [100 Clear] [101 Cedartone] [102 Redwood] [103 Dark Oak] [105 Cape Cod Gray] [106 Prairie Gray] [115 Honeytone] [116 Rustic Oak] [120 Pecan] [500 Clear] [501 Cedartone] [502 Redwood] [503 Dark Oak] [511 California Redwood] [515 Light Cedar] [516 Rustic Oak] [401 Cedartone] [402 Redwood] [415 Honeytone] [416 Rustic Oak] [420 Pecan]. The TWP colors contain ultraviolet screening pigments which prevent the premature deterioration of wood. [TWP [100 Clear] [500 Clear] does not contain ultraviolet screening pigments and will allow wood to age to a natural gray]. TWP should not be re-tinted. Colors may be intermixed to produce a wide variety of shades. [Except for the two grays, all of the colors] [The products] are semitransparent and allow wood grain and color to show through. APPLY PRODUCT TO A SMALL SECTION OF SURFACE TO BE COATED TO DETERMINE ACCEPTABILITY OF COLOR. Because horizontal surfaces are subject to harsher conditions (foot traffic, standing water, deck furniture, spills, etc.) than vertical surfaces, we can not guarantee color retention. Apply color maintenance coats as needed. TWP is designed for application to clean, absorbent, bare wood. TWP will not penetrate previously finished wood properly unless old finish is removed.

**SURFACE PREPARATION**

NEW WOOD: New wood should be allowed 6 to 12 months of natural weathering BEFORE finish coat application. After aging, wood should be cleaned with a solution of 1 part household bleach to 1 part water. The bleached surface should be thoroughly rinsed with water, power washed and then allowed to dry a minimum of 48 hours in good drying conditions before finish coat application.

OLD WOOD: Unprotected old wood is typically various shades of gray to black due to mildew and ultraviolet light attack on the wood surface. Old wood should be cleaned with a solution of 1 part household bleach to 1 part water. The bleached surface should be thoroughly rinsed with water, power washed and then allowed to dry a minimum of 48 hours in good drying conditions before finish coat application.

SEALED WOOD: Any previously applied finish must be removed before TWP can be applied. The surface should be cleaned with a solution of 1 part household bleach to 1 part water and should then be thoroughly rinsed with water. Finish can be removed with an appropriate stripper following label instructions, by sanding with 60-80 grit sand paper, or by power washing. If sanded, the surface should be thoroughly rinsed with water 2-3 different days after sanding. Allow wood to dry a minimum of 48 hours in good drying conditions before finish coat application.

NOTICE: Follow all precautions on bleach label. To minimize damage to vegetation, spray with water before, during and after bleaching. Do not allow bleach to come in contact with aluminum windows, doors and mechanical equipment.

*Note to Reviewer: Language in [ ] is optional or interchangeable*

### APPLICATION INSTRUCTIONS

TWP is a penetrating system and is not designed to build a film. Only apply TWP to properly prepared, clean, absorbent, bare wood. TWP should dry uniformly flat with no glossy areas. Only apply TWP when the temperature is 50-90° F. Do not apply TWP when rain is expected within 48 hours of application. Mix TWP thoroughly before and occasionally during use. On horizontal surfaces, apply an initial coat at 300-400 sq. ft./gal. Allow material to penetrate 15-30 minutes and then apply a second coat at 400-500 sq. ft./gal. [The need for an additional coat is strongly indicated if the wood soaks up the second coat within 15 minutes of application.] [Typically a two coat application using this procedure is adequate, but wood porosity may dictate the use of more or less TWP.] Remove any liquid material that remains on the wood surface 30-60 minutes after the application of the [second] [final] coat with a brush, dry roller, applicator pad or dry cloth. Excessive TWP that does not penetrate and is not removed from the surface will leave a shiny film, extend dry time and cause premature failure. One coat application may be adequate for vertical surfaces when finish is applied at saturation rate, as indicated when material starts to run down surface.

METHOD OF APPLICATION: Use brush, applicator pad, pump up sprayer or airless sprayer. If spray applied, back brush for best results.

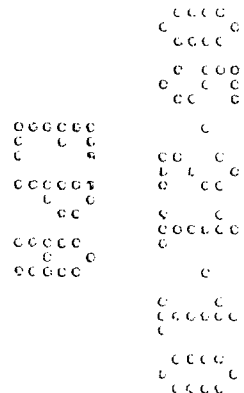
CLEAN UP: Use Mineral Spirits to clean equipment.

MIX THOROUGHLY BEFORE AND OCCASIONALLY DURING USE.

MAXIMUM VOC 550 grams/liter. DO NOT THIN.

Contains/CAS#:

Customer Satisfaction Guarantee: If you are 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.



Note to Reviewer: Language in [ ] is optional or interchangeable