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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 2 2010

Ms Christina M. Swick.
Agent for AMTECO, Inc.
Lewis & Harrison
122 C Street NW Suite 740
Washington, DC 20001

Subject: Product Name TWP Total Wood Preservative
EPA Registration No.:51578-1
Notification Date: 08/16/10
EPA Receipt Date: 08/16/10

Dear Ms. Swick,

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

Proposed Notification

- Changing numbering series on CSF alternative formulations dated September 1, 2010
- Change in max VOC
- Changes in weathering timeframe

General Comments

Based on a review of the submitted materials, your notification to revise the CSFs and label as referenced above, is acceptable.

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 or Glen McLeod by telephone at (703) 347-1081 or by e-mail at mcleod.glen@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

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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

August 16, 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: Jacqueline Campbell-McFarlane
Product Manager, Team 34**

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

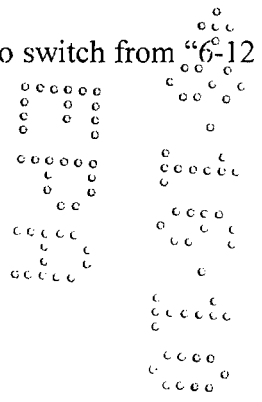
Dear Ms. Campbell-McFarlane:

On behalf of AMTECO, Inc., we are notifying the Agency of changes to the *TWP® Total Wood Preservative* label in accordance with PR Notice 98-10. The purpose of this notification is to make following minor revisions to the product label:

- Change the 400 series number system (i.e. "401 Cedartone") to a 1500 series number system (i.e. "1501 Cedartone"). In an effort to ensure that the alternate formulations on file correspond to the series numbering system on the label I have included Confidential Statements of Formula (CSFs) that have been revised to reflect the change in the series numbering system. Please note that no other changes have been made to the enclosed CSFs. With the exemption of the series numbering system they are identical to the previously approved CSFs on file with the Agency.
- Change the Maximum VOC listed to include the option to switch between "350 grams/liter" and "550 grams/liter".
- Change the required weathering for new wood to include the option to switch from "6-12 months" to "4-12 months."

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;



- 3) Three (3) copies of the proposed product label; and,
- 4) Two (2) copies of each CSF that corresponds to the revised series numbering system.

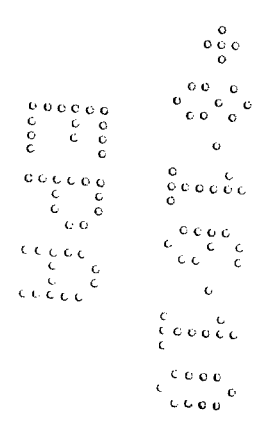
If you have any questions or comments, please contact me at 202-393-3903 ext. 16 or cswick@lewisharrison.com.

Phone #

Sincerely,

Christina M. Swick

Christina M. Swick
Agent for AMTECO, Inc.



TWP

NOTIFICATION
Date Reviewed: 9/7/10
Reviewed By: M. Mcleod

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

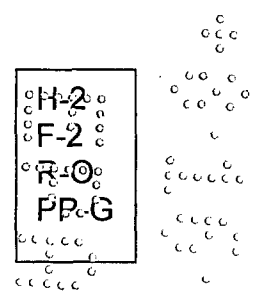
CAUTION

COMBUSTIBLE LIQUID AND VAPOR
See Back Panel For Additional
Precautionary Statements

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.

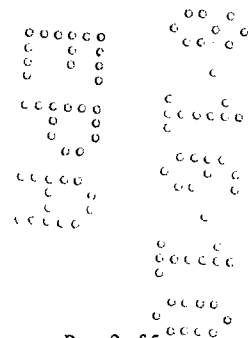
FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice
IF 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 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 mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
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.



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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

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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] [504 Black Walnut] [511 California Redwood] [515 Light Cedar] [516 Rustic Oak] [1500 Clear] [1501 Cedartone] [1502 Redwood] [1503 Dark Oak] [1504 Black Walnut] [1511 California Redwood] [1515 Honeytone] [1516 Rustic] [1520 Pecan] [1530 Natural]. The TWP colors contain ultraviolet screening pigments which prevent the premature deterioration of wood. [TWP 100 Clear] [500 Clear] [1500 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[4] 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.

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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.

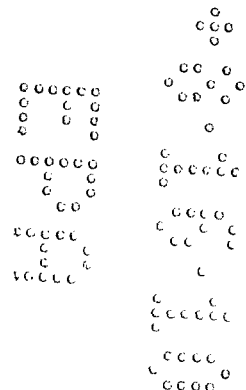
CLEAN UP: Use Mineral Spirits to clean equipment.

MIX THOROUGHLY BEFORE AND OCCASIONALLY DURING USE.

MAXIMUM VOC 550[350] 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.



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