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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 1, 1996

Christopher A. McConville
General Counsel
American Building Restoration Products, Inc.
9720 South 60th Street
Franklin, WI 53132

SUBJECT: Labeling Amendment
X-100 Natural Seal Wood Preservative
EPA Reg. No. 56165-1
Your Letter Dated October 18, 1995

Dear Mr. McConville:

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. Submit one (1) copy of your final printed labeling before you release the product for shipment.

1. Move the ingredients statements to the front panel.
2. Place the Signal Word "**WARNING**" on the front panel using at least 18 point type. Put the Signal Word in a box or have it stand alone from other text.
3. The child warning "**KEEP OUT OF REACH OF CHILDREN**" on the front panel must be modified as follows:
 - a. Separate it from the Signal Word "**WARNING**". The word "**WARNING**" is the Signal Word and must stand alone in the center panel.
 - b. The typeface must be solid style and at least 12 points in size.
 - c. The child warning statement found at the bottom of the left panel in a box with other wording must be deleted since it appears on the center panel.
4. Delete the phrase "Harmful or fatal if swallowed." from the front panel because this statement already appears in the Precautionary Statements section.
5. Delete the words "**NOW APPROVED**" in the oval on the front panel since this may be interpreted to mean that this product is recommended or endorsed by any agency of the Federal Government.
6. Add "**NET CONTENTS:**" to the front panel.

- 7. Modify the language in the box on the bottom of the right panel to read "NOTE: SLIPPERY WHILE DRYING. DO NOT WALK ON SURFACES UNTIL THOROUGHLY DRY."
- 8. In the Precautionary Statements section, change the last sentence to read "Harmful or fatal if swallowed. Harmful if absorbed through the skin."

Please resubmit your last accepted Confidential Statement of Formula along with the approval letter and review (if sent to you). This information is missing from our files. If you have any questions, please contact Dick Peacock of my staff at (703) 305-7381.

Sincerely,

Theresa A. Stowe

Theresa A. Stowe
 Acting Team Leader
 Product Manager 22
 Fungicide-Herbicide Branch
 Registration Division (7505C)

Enclosure

**PRECAUTIONARY STATEMENT:
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

WARNING: This product is a potential skin sensitizer. This product may cause eye damage and skin irritation upon contact. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, rubber gloves and protective clothing when handling. Harmful if swallowed or absorbed through skin. Avoid breathing vapors or mist.

FIRST AID

IF ON SKIN— Immediately wash skin thoroughly with soap and water.

IF SWALLOWED— Do not induce vomiting. Drink a large quantity of milk, egg whites or gelatin solution. If these are not available, drink large quantities of water. Avoid alcohol. Call physician or Poison Control Center.

IF IN EYES— Flush immediately with copious amounts of clean, cool water for 15 to 20 minutes. Seek medical attention immediately.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Treat symptoms. Measures against circulatory shock, respiratory depression and convulsion may be needed.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment washwater. Permits may be required for discharges containing this pesticide into lakes, streams, ponds or public water. For guidance, contact the regional office of the Environmental Protection Agency.

CLEAN UP: Mineral spirits or dish detergent and water. If X-100 Natural Seal® should get on surfaces such as glass, paint, metal, caulking or rubber, remove immediately with dish detergent. If a spill is dry, clean with mineral spirits.

DISPOSAL: Do not reuse empty can. Wrap can and place in trash. Leaking or damaged containers should be placed in a plastic bag and discarded. Contact local, state or federal agencies to ensure compliance of proper disposal methods and respective regulations.

STORAGE: Keep container closed when not in use. Store in cool place. This product should be kept out of reach of children and stored away from food.

LIMITED WARRANTY

This warranty is valid for one year from the date of purchase. The purchaser of X-100 Natural Seal® shall be entitled to the following, if the product herein is shown to be defective. ABRP, Inc., at its option, will either replace the product or refund the purchase price. Contact ABRP, Inc., to make claim under this warranty. The purchaser must have proof of purchase from label and original sales receipt. Proper surface preparation is essential to the applicability of this warranty. Read and follow label directions.

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

No other warranties are made, expressed or implied, including without limitation warranties as to MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. In all events, ABRP, Inc., liability shall be limited solely to replacement of product provided above.

This limited warranty may not be modified or extended by manufacturer's representatives, distributors, or dealers of ABRP, Inc., products.

Some states do not allow the exclusion or limitation of incidental or consequential damages so the above limitation or exclusion may not apply to the purchaser. This warranty gives the purchaser specific legal rights, as well as other rights which may vary from state to state.

Note: X-100 Natural Seal® is designed to protect and preserve wood and is not designed to prevent wood from accumulating dirt and atmospheric pollutants. See deck maintenance for proper cleaning procedures for general wood surfaces.

USE ONLY WITH ADEQUATE VENTILATION

ACTIVE INGREDIENTS:

Methylene bis (thiocyanate).....0.5%
2-(thiocyanomethylthio) benzothiazole.....0.5%
INERT INGREDIENTS.....99%
Contains Petroleum Distillate

The product weighs 6.6 pounds per gallon.

BATCH NO. _____

American Building Restoration Products, Inc.
9720 South 60th Street, Franklin, Wisconsin 53132
National: 1-800-346-7532
In Wisconsin 414-421-4125
Fax 414-421-8696
EPA Registration No. 56156-1

KEEP OUT OF THE REACH OF CHILDREN.
— WARNING —
HARMFUL IF SWALLOWED

**NATURAL
WOOD**

**ONE
HEAVY DUTY FORMULA
NOW APPROVED
For Decks, Sidewalls & Roofs.
Protects Seasoned and
Unseasoned Wood.**

X-100 NATURAL SEAL® RESERVATIVE



PREVENTS
MOISTURE
DAMAGE

ULTRAVIOLET
PROTECTION
OIL BORNE

ACCEPTED
with COMMENTS
EPA Letter Dated
FEB - 1 1996

the Federal Insecticide,
Fungicide, and Rodenticide Act
is required, for the pesticide
registered under EPA Reg. No.
56156-1

— Keep out of reach of children —
Warning
Read label or label on container.
See other side of box for
directions.

X-100 Natural Seal® formula is a wood preservative consisting of 23 essential wood protecting ingredients blended in a paraffinic oil which is non-sensitive to ultra violet rays. X-100 Natural Seal® is designed to penetrate the wood.

The X-100 Natural Seal® unique oil-borne system is V.O.C. compliant. X-100 Natural Seal® protects against the environmental forces of wind, rain, snow, ice and sun. X-100 Natural Seal® is formulated for minimal evaporation. Therefore, these active ingredients mean more product penetration into the wood per application.

X-100 Natural Seal® protects wood against cracking, splitting, cupping, curling, sapstain, mold and mildew and replaces the natural oils in the wood fiber that were lost when the tree was cut. When a tree is cut, it loses its natural defense mechanisms. Eventually the bark is removed, further exposing the wood to the elements.

FOR BEST RESULTS: Apply only under ideal conditions. Do not apply if rain is forecast within a 24 hour period. **SURFACE MUST BE DRY. BOTH SURFACE AND AIR TEMPERATURE MUST BE ABOVE 50°F.**

For lumber that is not dried or seasoned: X-100 Natural Seal® is formulated to protect damp wood. However, the duration of protection will be in direct relationship to how much X-100 Natural Seal® the wood has absorbed. That is, the greater the dampness of the wood the less amount of absorption.

PREPARATORY WORK

Test wood for porosity: If a drop of water does not soak into the dried wood surface, this may be due to mill glaze. **MILL GLAZE:** A smooth glossy (waxy) film found on newly sawn lumber which is impervious to coatings. **IMPORTANT:** On new lumber, especially on decks/walking surfaces, REMOVE THE MILL GLAZE with X-180 WEATHERED WOOD RESTORER™ or allow deck to weather 2 to 3 weeks and test again.

DIRECTIONS FOR USE

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

Mix X-100 Natural Seal® well before using. A test area should be performed before beginning overall project to determine the amount of X-100 Natural Seal® the wood will absorb, dry time, wood porosity and total desired look. Fully protect all adjacent surfaces, as well as general work area. When spraying near vegetation, cover plant life with cardboard or other suitable material in case of overspray.

PRECAUTIONS: Do not use on wood that will be in direct contact with soil.

COVERAGE:

DECK AND SIDEWALL: 100 to 200 sq. ft. per gallon, depending on porosity of surface.

ROOF: 75 to 150 sq. ft. per gallon, depending on porosity of surface.

— WARNING —
SLIPPERY WHILE DRYING
DO NOT WALK ON SURFACES UNTIL THOROUGHLY DRY

DECK APPLICATION

Apply X-100 Natural Seal® with a brush or staining pad. Work vigorously into walking surfaces.

1. Application of X-100 Natural Seal® to weathered grey or dirty wood will further blacken the surface. To achieve a more natural wood color, clean deck with X-180 Weathered Wood Restorer™ before treating with X-100 Natural Seal®.

2. Apply only as much X-100 Natural Seal® as the wood will absorb to reach a uniform appearance. Note, the same piece of wood may absorb differently in areas.

Note: Avoid oversaturation, particularly on horizontal deck surfaces: Imagine filling a sponge with water to a point where water overflows due to oversaturation. This same type of oversaturation point can occur after applying X-100 Natural Seal®. At this point, rub off the top layer excess with a rag before it dries. The ideal situation is to get the wood to absorb as much material as it can to get the maximum results without any excess on the surface, especially on new decking.

DRYING TIME: Allow at least 48 hours to dry. Each horizontal surface will have different dry times. Always check horizontal surfaces prior to usage.

DECK MAINTENANCE: Atmospheric pollutants and ordinary abrasive foot traffic will leave dirt on horizontal deck surfaces. Rainwater alone does not wash such deposits away.

Removal of deposits will require routine deck maintenance. Unlike sidewalls, horizontal deck surfaces require washing a minimum of once in spring and once in fall. X-180 Weathered Wood Restorer™ is recommended. After washing, the wood is conditionally protected but the horizontal surface may need to be retreated on an annual basis.

SIDEWALL APPLICATION

Apply X-100 Natural Seal® with a brush or low pressure sprayer.

1. Apply as much X-100 Natural Seal® as the wood will absorb.
2. To avoid runs, and streaking, back brush product from surfaces before drying. Rough sawn wood will generally absorb more product evenly, however, it will still require back brushing.
3. Keep a wet edge to avoid lap marks.
4. If the wood can absorb more X-100 Natural Seal® and extra protection or more depth of color is desired, apply wet on wet coats or a second coat at later date.
5. Use X-100 Natural Seal® Interior Grade for any interior work.

ROOF APPLICATION

Apply with a brush, low pressure sprayer or heavy nap roller.

Saturate well. After a noticeable penetration of the first coat, a second coat is recommended, wet on wet, if not more. This creates a product build-up without streaks or runs, resulting in more X-100 Natural Seal® protection over a longer period of time.

HELPFUL HINTS: When a natural cedar color is desired, use Cedar Tone Gold. If white film from sap occurs around knot holes, scrub with plastic abrasive type pad dipped in paint thinner. For further protection, apply X-100 Natural Seal® on both sides of the wood. Do one elevation at a time. If the application has to be interrupted, stop at a corner as opposed to the middle of the wall. If questions still need to be addressed prior to application, call for technical assistance at 1-800-346-7532.

Bar Code Area
To Be
Picked-up

Handwritten marks: 4 4 4