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57227-3

12-6-99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Contechem, Inc.  
P.O. Box 3255  
Portland, OR 97208

DEC 06 1999

Subject: Britewood XL, Sapstain Control  
EPA Registration No. 57227-3  
Your Amendment Date: 6/8/99

Attention: Mr. Robert Stewart, Ph. D.  
Regulatory Consultant

The amendment referenced above, submitted in connection with registration under FIFRA, as amended, to change the spray application dilution rate is acceptable provided the following recommendations are addressed before this product is released for shipment.

**Occupational Exposure Assessment:**

Britewood XL Sapstain Control was evaluated to assess the potential occupational exposure concerns associated with handling a more concentrated treatment solution for spray applications. The occupational exposure assessment was conducted using two occupational handler exposure scenarios representing the automated closed systems used in sawmill operations. The first scenario is the delivery of sapstain treatment concentrates to a holding tank for closed metered mixing of diluted treatment solutions, and the second scenario is the spray application process that occurs in enclosed spray chambers. The assessment concluded that the potential occupational handler exposures associated with the revised dilution rate and use pattern are minimal since the saw mill operations are conducted remotely using closed automated processes, and the product labeling stipulates the use of personal protective equipment (PPE), protective clothing and rubber gloves, for handlers.

Also, a "cursory" risk assessment was performed to determine the potential dermal and inhalation risks associated with short-term/intermediate-term occupational exposures to the formulation's two active ingredients, Didecyl dimethyl ammonium chloride and Propiconazole. Using the two handler exposure scenarios identified above, a worse case assumption was utilized to yield a conservative estimation of risk for the exposure assessment. The short-term/intermediate-term Margins of Exposure (MOEs) were calculated for both dermal and inhalation exposure routes which were acceptable, greater than 100. Therefore, there is minimal potential for adverse inhalation exposures to handlers without respirators as well as dermal

CONCURRENCES

SYMBOL	1516C						
SURNAME	Campbell						
DATE	12/6/99						

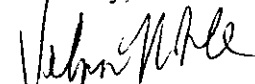
exposures to handlers wearing PPE clothing during closed mixing/loading and closed spray applications. The results of this assessment support the use of engineering controls to contain the application operations via closed delivery systems to limit exposures to sawmill workers. A copy of the complete review is enclosed with this letter.

**Labeling Recommendations:**

1. Under the "Directions for Use", the statement, "Personal Protective Equipment must be worn by all handlers ", must be added in bold.
2. Under "Directions For Use," The use of this product for Wood Chips/Saw Dust intended for paper making must be associated with the disclaimer statement or note of clarification on whether the product can be used for food-grade/food-contact paper or paperboard. You should note that any food-contact use pattern may prompt the need for an FQPA human health risk assessment.
3. Under "Directions For Use", you must specify the different rates of dilution for the "Dip Tank Application" (i.e., 1 gallon of product to 50-200 gallons of water) vs. The "Spray Application" (i.e., 1 gallon of product to 20-150 gallons of water), since only the spray application use dilution range is to be amended.
4. This product is Toxicity Category I for primary skin irritation. Since this product causes skin burns, the exposed individual must seek medical attention. Therefore, you should delete the phrase, "if effects persists," from the "IF ON SKIN" instructions.
5. According to the Label Manual (2<sup>nd</sup> Edition), the "Note to Physician" should be located in close proximity to the "Statements of Practical Treatment", but should be clearly distinguished from it. (i.e. it should not be mixed in with the Practical Treatment statements, but appear separate and below the last first aid statement.)
6. Under "Storage and Disposal," the heading, "Prohibitions," should be replaced with "Storage" as the heading.

A stamped copy of the label is enclosed for your records. You must submit a final printed label to the Agency before this product is released for shipment. If you have any questions regarding this letter, please contact Jacqueline Campbell at (703) 308-6416.

Sincerely,



Velma Noble

Product Manager 31

Regulatory Management Branch I

Antimicrobials Division (7510C)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
DEC 6 1999

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 57227-3

# BRITEWOOD XL

## DIRECTIONS FOR USE

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

For control of mold and fungus on green or freshly cut lumber and other wood products.

Examples of other wood products include:

**Logs:** Staining can be inhibited in freshly debarked logs used for log home construction, export, yarding prior to sawing, and other purposes.

**Particle Board:** Wood furnish for particle board, wafer board, oriented strand board, and similar products can be protected from discoloration during storage by treatment with BRITEWOOD XL, Sapstain Control.

**Wood Chips/Saw Dust:** Treatment of wood chips, saw dust, or other similar byproducts intended for paper making reduces discoloration and lowers bleaching requirements for finished paper products.

**Plywood Veneer:** Treatment with BRITEWOOD XL, Sapstain Control is effective on freshly peeled green veneer and other similar plywood furnish that can be especially subject to mold development that can interfere with appearance or laminating adhesive performance.

For best results, lumber and wood products should be treated immediately, at least within twenty-four hours after cutting or sawing. Mold and fungus growth begins immediately after cutting, so delayed treatment is much less effective and requires increased chemical concentration. Green untreated lumber should not be used for stickers. Freshly treated lumber should not be allowed to remain unprotected in heavy rains.

BRITEWOOD XL, Sapstain Control may be used in a dip tank or spray application. Before use, dilute at the rate of 20-150 gallons of water per gallon of this product. Seasonal variation in storage and shipping conditions, species and condition of wood should be considered in selection of end use concentration. For effective inhibition of mold and fungus, lumber and logs must be dipped or sprayed such that all surfaces are uniformly treated.

**Dip Tank Application:** The most effective sapstain treatment of lumber is done using a dip tank application. For use in black iron tanks, this product and other products using this active ingredient must be considered corrosive when the pH is less than 2. Iron will dissolve at pH 2 or less and can then react with the tannic acids in wood to cause chemical darkening with iron stain. Chain and equipment marks will exacerbate this chemical staining. The use of a buffer is recommended to maintain an alkaline pH (typically greater than pH 8) at which iron is not soluble. This effectively inhibits corrosion and eliminates iron stain. The type of buffer recommended depends on mill water conditions (e.g. mineral content, hardness, pH, etc.). Dip tanks and drip aprons must be roofed, paved, and drained to prevent dilution and loss of the antistain solutions.

**Spray Applications:** Low pressure equipment is recommended for spray applications. A moderately fine spray, not an aerosol fog, generally provides the best coverage at practical product concentrations. For treatment of wood chips, sawdust or other particle board like products, spray application should be made at a convenient location in the process where mixing and uniform coverage can be accomplished. Use of a buffer is recommended where black iron equipment might cause chemical staining, as discussed above.

DOT Proper Shipping Name:  
Corrosive liquid, n.o.s., 8, UN 1760, PG II (Quaternary ammonium chloride)  
Emergency Phone: Chemtrec: 1-800-424-9300

## SAPSTAIN CONTROL

For Fresh Cut Lumber  
and Wood Products

BRITEWOOD XL Sapstain Control, inhibits the growth of mold and fungus that may cause discoloration and/or deterioration of freshly cut lumber and wood products during storage and shipment.

### ACTIVE INGREDIENTS

Didecyl Dimethyl Ammonium Chloride	46.25%
Propiconazole: 1-((2-(2,4-Dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl) methyl)-1H-1,2,4-triazole.	4.90%
INERT INGREDIENTS	48.85%
TOTAL	100.0%

KEEP OUT OF REACH  
OF CHILDREN  
DANGER

See side panel for additional precautionary and practical treatment statements.

FOR INDUSTRIAL AND  
COMMERCIAL USE ONLY

CONTECHEM INC.  
P.O. BOX 3255  
PORTLAND, OR 97208  
(503) 283-3021

EPA Reg. No. 57227-3  
EPA Est. No. 57227-OR-003

NET CONTENTS: 55 GALLONS

## PRECAUTIONARY STATEMENTS

### Corrosive

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER:** Causes irreversible eye damage or skin burns. May be fatal if swallowed. Harmful if inhaled. Avoid breathing vapors or spray mist. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash clothing before reuse.

#### STATEMENT OF PRACTICAL TREATMENT (FIRST AID)

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention if effects persist. **IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting. **IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. **IF IN EYES:** Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

#### ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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 Office of the EPA.

#### STORAGE AND DISPOSAL

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

**PROHIBITIONS:** This product must be kept under locked storage sufficient to make it inaccessible to children or persons unfamiliar with its use.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture or rinseate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your state Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Do not reuse empty container. Triple rinse or equivalent, then offer for recycling/reconditioning or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### DISCLAIMER

The manufacturer and distributor make no warranty, expressed or implied, concerning the use of this product other than as directed on the label. The use of this product being beyond the control of the manufacturer or distributor, no warranty, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. Upon acceptance of delivery of this product, the buyer assumes all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

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