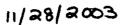
59905-11





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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

November 28, 2003

Mr. Terry Hofrichter Perma Chinks Systems, Inc. 17635 NE 67th Ct. Redmond, WA 98052

Dear Mr. Hofrichter:

Subject: Label Amendment Per PR Notice 2001-1 Armor-Guard Industrial EPA Registration Number 59905-11 Your Submission Dated August 11, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following label changes.

1. Revise the Container Disposal statement to read as follows.

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

You must submit two (2) final printed label before you release the product for shipment. A stamped copy is enclosed for your records.

Sincerely,

Linda G. Arrington Acting Product Manager 10 Insecticide Branch Registration Division (7505C)

enclosure

ARMOR-GUARD® INDUSTRIAL

A PRESERVATIVE FOR PROTECTION AND TREATMENT OF WOOD AND WOOD-FOAM COMPOSITES STRUCTURAL COMPONENTS AGAINST DECAY FUNGI AND WOOD-DESTROYING INSECTS.

ACTIVE INGREDIENT:

Disodium Octaborate Tetrahydrate ... 98% by weight $(Na_2B_8O_{13} \bullet 4H_2O)$

INERT INGREDIENT: 2% by weight Product contains 2% H₂O - absorbed moisture)

CAUTION KEEP OUT OF REACH OF CHILDREN NOT FOR FOOD OR DRUG USE

EPA Reg. No. 59905-11 EPA Est. 59905-TN-1

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION:

Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food and feed. Do not leave container where children or animals may gain access.

ENVIRONMENTAL HAZARDS

Armor-Guard or Armor-Guard solutions carelessly spilled or applied to cropland or growing plants, including trees and shrubs, may kill or seriously retard plant growth. This pesticide is toxic to fish and wildlife. Do not contaminate water by cleaning of equipment or disposal of wastes. 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.

Personal Protective Equipment (PPE)

Mixers/loaders, applicators and other handlers must wear: Long sleeve shirt and long pants, shoes plus socks, protective eyewear, chemical resistant gloves (such as barrier laminate, butyl rubber, nitrila rubber, neoprene rubber, polyvinyl chloride or viton) and, in confined spaces, a respirator with an organic removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-14(7); or a NIOSH approved respirator with an organic vapor (OV) cartridge with any N, R, P or HE prefilter.

USER SAFETY RECOMMENDATIONS	• •
Users should wash hands before eating, drinking, chewing gum, using tobacco or using the	toilet:
Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly a	
clean clothing.	* * * *
Users should remove personal protection equipment immediately after handling this produc	t. Wash the
outside of gloves before removing. As soon as possible wash thoroughly.	

ACCEPTED with COMMENTS In EPA Lotter Dated: NOV. 2,8 2003

Under the Federal Insecticide, Fungleide, and Rodenticide Ars, as anomaled, for the posticide registered under EPA Rey. No. 5990.5-11

FIRST AID				
IF SWALLOWED	 Immediately call a poison control center or doctor for treatment advice. Have person drink 1 to 2 glasses of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. 			
IF IN EYES	 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 ON SKIN	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call a poison control center for treatment advice. 			
IF INHALED	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. 			
In case of emergency doctor or going for tre	n, have the product container or label with you when calling a Poison Control Center or patment.			

STORAGE AND DISPOSAL

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

Storage: Store in a dry place. Do not store where children or animals may gain access.

Pesticide disposal: Wastes resulting from the use of this product may be disposed of on site or at approved waste disposal facility.

Container disposal: Do not reuse empty container. Consult Federal, State, or Local authorities for approved disposal procedures.

DIRECTIONS FOR USE:

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

ARMOR-GUARD INDUSTRIAL is water soluble inorganic borate salt for the protection and treatment of lumber and wood-foam composite structural components against decay fungi and wood boring beetles including Powder-Post Beetles (Lyctidae), Furniture Beetles, Old House Borers (Anobiidae), and Longhorn Beetles (Cerambycidae). This treatment is not effective against wood staining fungi and may require mixing with compatible products.

ARMOR-GUARD INDUSTRIAL also controls Subterranean Termites (Reticulitermes, Coptotermes [Formosan], Heterotermes), Dampwood Termites (Zootermopsis), Drywood Termites (Kalotermes, Incisitermes) and Carpenter Ants (Camponotus).

ARMOR-GUARD INDUSTRIAL is recommended for all interior and exterior wood and wood-foam composite structural components, which will be protected, from rain and not in direct contact with soil. The treatment of lumber is permanent even after cutting and finishing providing the wood is not exposed to moisture or in contact with the soil. This product is toxic to wood destroying insects but surface etching of treated wood and wood-foam composite structural components may occur.

DIP-DIFFUSION TREATMENT:

w, water should be add

PREPARATION OF SOLUTIONS: To prepare solutions, described below, water should be added to the tank to about 80% of the solution required. The temperature is then raised to the desired level and the calculated amount of ARMOR-GUARD INDUSTRIAL is gradually added with good agitation. . The remaining water is then added and the solution agitated for an additional 10 minutes to ensure that all of the product has dissolved. The temperature of the solution should be maintained during

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treatment. Upon cooling some borate may crystallize out of the solution, but will re-dissolve when the solution is heated for the next treatment session. In very cold weather, some heating or insulation should be provided to prevent solidification in the bottom of the tank. The tank should be covered when not in use to prevent contamination and evaporation of water.

SUGGESTED CONDITIONS AND SOLUTION STRENGTHS FOR THE DIP-DIFFUSION METHOD

Lumber Thickness	Pounds of ARMOR-GUARD IND. Solution for 100 Gallons Solution	Temperature	Diffusion Period
Up to 1 inch (2.5 cm)	140	105°F (40°C)	2 to 4 weeks
1 to 1.75 inches (2.5 cm to 4.0 cm)	180	120°F (50°C)	4 to 6 weeks
1.75 to 2.5 inches (4.0 cm to 6.5 cm)	250	130°F (55°C)	4 to 6 weeks
2.5 to 3 inches* (6.5 cm to 7.5 cm)	280	135°F (57°C)	6 to 8 weeks

*Lumber over 3 inches (7.5 cm) in thickness or over 5 inches (12.5 cm) in width should be dipped twice 24 to 72 hours apart.

DIP DIFFUSION METHOD OF APPLICATION: Dip freshly cut lumber in a tank containing a hot aqueous solution of ARMOR-GUARD INDUSTRIAL for 2 to 5 minutes. After dipping, the newly treated wood should be stacked and stored under a tarpaulin or shed roof to slow the drying process and prevent wash off by rainfall, thus improving penetration. Diffusion of the wood preservative into the interior of the wood will start immediately and will require several weeks to thoroughly penetrate the lumber, depending on species and thickness of wood. The dip-diffusion method of treatment can result in complete penetration throughout the whole cross-sectional area of treated lumber.

PRESSURE TREATMENT: Pressure treatment must rigidly adhere to the current specifications of ARMOR- GUARD INDUSTRIAL and/or those of the American Wood Preservers' Association (AWPA).

PRE-TREATMENT: Wood-foam composite structural components may be treated to prevent infestation of attacking organisms. Apply a 10% aqueous solution of ARMOR-GUARD INDUSTRIAL (11b./gallon solution). Solution may be applied by spray or brush until surface is thoroughly wetted (approximately 7-10 gallons per 1000 sq.ft.). Current ARMOR-GUARD INDUSTRIAL and/or American Wood Preservers' Association specifications and test methods should be followed to ensure adequate chemical loadings in wood.

Pretreatment of Polystyrene beads prior to expansion. Mix ARMOR-GUARD. INDUSTRIAL dry chemical 3% to 5% weight to the dry polystyrene beads and process in normal manner to manufacture Polystyrene insulation.

Notice

Because of many varying conditions affecting use and application, manufacturer warns buyer that these may impair or vary the results or effects of the use of this product. In any event, complete prevention of decay by fungi or other organisms is not guaranteed. Neither manufacturer nor seller shall be liable in respect to any injury or damages suffered by reason of the use of this product for a purpose not indicated by the label, or when used contrary to the directions or instructions hereon, nor with respect to breach of any warranty not expressly specified herein. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label.

There are no express warranties on ARMOR-GUARD INDUSTRIAL or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. Manufacturer shall not be liable for any consequential damages based on the use of the product.

Packaged by: Perma-Chink Systems, Inc. 1605 Prosser Road Knoxville, TN 37914 (865) 524-7343

Rev 06/10/03