62190-24 UNIT STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 1 4 2011

John R. French, Ph.D Senior Regulatory Manager Arch Chemicals, Inc. 5660 New Northside Drive Suite 1100 Atlanta, GA 30328

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Subject:

AntiBlu® IP75

EPA Registration No.: 62190-24 Application Date: 03/22/2011 Receipt Date: 03/23/2011

Dear Dr. John R. French:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable.

Proposed Amendment

Addition of mold remediation directions

General Comments

A stamped label is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

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 Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at carl.jaclyn@epa.gov.

When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

> Sincerely. queline Cambbell-Mcfarlane oduct Manager (34)

CONCURRENCE Latory Management Branch II imicrobials Division (7510P) SYMBOL SURNAME

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

OFFICIAL FILE COPY

AntiBlu[®] IP75

Update: 2011-04-13 Last changes in red

FOR THE CONTROL OF SAPSTAIN AND MOLD ON FRESH WOOD AND SEASONED WOOD AND WOOD PRODUCTS

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED: Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass 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 INHALED: 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.

IF ON SKIN OR CLOTHING: 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 IN EYES: Hold eye(s) open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue to rinse eye(s). Call a Poison Control Center or doctor for treatment advice.

Have the product container or label with you when you call a Poison Control Center or doctor, or when going for treatment.

IN CASE OF EMERGENCY CALL: 1-800-654-6911

Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 62190-24 EPA EST NO. xxxx-yy-zz

Manufactured by: ARCH WOOD PROTECTION INC. 5660 New Northside Drive, Suite 1100 Atlanta, GA 30328

Net contents: gallons

ACCEPTED with COMMENTS EPA Letter Dated:

APR 1 4 2011

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

62190-24

Update: 2011-04-13 Last changes in red

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes, or clothing. Wear the proper Personal Protective Equipment as specified below. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash before reuse. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:
Coveralls over long-sleeved shirt and long pants
Socks and chemical resistant footwear
Goggles or face shield
Chemical-resistant gloves (such as: barrier laminate or Viton)

USER SAFETY REQUIREMENTS

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separate from other laundry. Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users must remove personnel protective equipment immediately after handling this product. Wash outside of gloves before removing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate. 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. Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

PESTICIDE STORAGE: Do not freeze. Protect from physical damage. Store in a clean, dry, well ventilated area. Keep away from incompatible chemicals and from unguarded flame, sparks, and heat sources. Store in PVC, polypropylene, or polyethylene container. Do not store in Carbon Steel. Do not store above 104°F.

PESTICIDE DISPOSAL: [For containers >5 gallons] Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the

Update: 2011-04-13 Last changes in red

container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

PESTICIDE DISPOSAL: [For containers <5 gallons] Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

(CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.)

(CONTAINER DISPOSAL: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents form this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with pump for 2 minutes. Pour or pump rinsate into application equipments or rinsate collection system. Repeat this rinsing procedure two more times.)

Update: 2011-04-13 Last changes in red

DIRECTIONS FOR USE

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

[LUMBER & TIMBER SAPSTAIN:

AntiBlu IP75 may be applied to wood and wood products by immersion or spray methods according to the dilutions provided below. Dilution levels may vary widely and will depend on application methods, wood species, seasonal changes in exposure conditions, length of protection desired, geographical locations, and wood storage and transport conditions.

- For spray applications: Mix one gallon of AntiBlu IP75 to 15-100 gallons of water.
- For immersion applications: Mix one gallon of AntiBlu IP75 to 50-300 gallons of water. If lumber is to be treated by dipping, then apply the treating solution to the wood for at least 10 seconds. For block stacked lumber, immersion time must be sufficient to allow penetration of the treating solution to the center of the pack. For best results, treat green wood immediately at least within 24 hours after cutting or sawing. Mold and fungus growth begins immediately after cutting so delayed treatment is less effective and requires increased chemical concentration.

Allow treated wood to drain in a contained area before storage, and ensure that freshly treated wood is not allowed to remain unprotected in heavy rains. For actual dilution rates in specific locations/conditions and for a given type of application method (dip or spray) contact an Arch Wood Protection representative for detailed supporting information. Do not apply this product in a way that will contact workers or other persons.]

[ON-SITE (in situ) MOLD TREATMENT

[AntiBlu IP75 or This product], in combination with BORA-CARE (EPA Reg. No. 64405-1), can be used as an on-site preventative and, if needed, remedial treatment for indeer structural wood (framing lumber), particle board, cellulosic panel products (plywood, oriented strand board and drywall) sheathing and insulation. AntiBlu IP75 and BORA-CARE will prevent mold growth and control decay and wood destroying insects in new and renovated construction and kill and control molds in existing structures that require remediation. Duration of mold control may last for several years, but depends upon the conditions under which the building materials are maintained. If mold develops, follow "REMEDIATION TREATMENT" instructions below.

For use by Mold Remediation Workers, Mold Remediation Contractors, Certified Mold Remediators, Certified Mold Contractors, Certified Mold Remediation Contractors, Applied Microbial Remediation Technicians, Certified Mold Professionals, Certified Restorers, and Mold Remediation Companies and Professional Water Damage Companies.

Follow the mixing and application instructions below for using AntiBlu IP75 in combination with BORA-CARE. Apply the use-solution to new or renovated construction at the "dried in" stage of construction when all structural wood is in place but prior to the installation of drywall, insulation, mechanical systems and electrical wiring. When treating drywall in susceptible areas such as fire walls, apply the use-solution prior to painting.

Use AntiBlu IP75/BORA-CARE for remedial treatments, as follows: 1) after flooding has occurred or 2) for spaces, particularly crawl spaces, that are prone to mold buildup due to humid conditions. When treating flooded areas, the insulation must be removed prior to treatment and then the use-solution should be applied to bare wood. Read carefully and follow the instructions below prior to any remediation treatment.

Do not treat materials that will be used as food-contact surfaces or are currently used as food-contact surfaces. When used on the interior sides of living spaces, the treated surfaces must be subsequently covered with overlayment materials such as wallpaper, paint or similar coatings.

6/8

62190-24 AntiBlu IP75 MASTER LABEL Update: 2011-04-13 Last changes in red

AntiBlu IP75 and BORA-CARE must be mixed prior to application. Follow the instructions below for proper mixing.

Mixing Procedure:

- 1. Pour 4 gallons of water into a six-gallon pail.
- 2. Attach mixing impeller to drill and begin agitation
- 3. Gradually add 1 gallon of BORA-CARE and 1 pint of AntiBlu IP75 into the pail of water and continue to mix solution.
- 4. Use 1 gallon of water to triple rinse the AntiBlu IP75 and BORA-CARE containers and pour contents into the mixing solution
- 5. Continue to mix until solution is fully mixed. Normal mixing time may be 5 minutes. Warm water will reduce mixing time.

NOTE: Do not allow mixing impeller to touch sides or bottom of pail. This may create small plastic chips that could clog spraying equipment.

Application Instructions:

Use a 2-4 gallon hand-held stainless steel sprayer or backpack sprayer to apply up to 2-4 gallons of the AntiBlu IP75 /BORA-CARE use-solution at a time. Use a 10-100 gallon spray unit with mechanical pump for larger amounts. One gallon of the use-solution will treat 400 board feet of wood or 400 square feet of sheathing, insulation or drywall.

Assure uniform coverage of surfaces to be treated. Surfaces must be evenly wet without runoff or pooling. Cleaning of surfaces may be needed prior to application. Permit treated surfaces to be thoroughly dry before painting or affixing overlayment materials such as siding, wallboard, or flooring.]

REMEDIAL TREATMENT

AntiBlu IP75 must be used as part of a comprehensive mold remediation or water damage restoration program, including:

- Periodic monitoring and inspection of conditions favorable to mold growth such as moisture ingress and high relative humidity.
- Effecting repairs as necessary to eliminate conditions favorable to mold growth.
- Drying of affected areas to below 20% moisture content.

For remedial treatment, follow the mixing and application instructions provided above.

Consult the following associations and Internet sites for information on standards and guidelines for remedial treatment of mold and mildew.

- IAQA-Indoor Air Quality Association (www.iaga.org)
- EPA-Environmental Protection Agency (www.epa.gov)
- DOH-New York City Dept. of Health (www.cLnyc.ny.us/html/doh)
- IICRC-Institute of Inspection, Cleaning and Restoration Certification (www.iirc.org)

Small Areas - Total Surface Area Affected is Less than 10 square Feet Cleanup Methods

Before applying AntiBlu IP75 and BORA-CARE, visible mold growth must be removed and conditions favorable to mold growth must be identified and corrected. Use one of the following or another preferred professional method.

Wood Surfaces

Method 1: Wet vacuum (in the case of porous materials, some mold spores/fragments remain in the material but will not grow if the material is completely dried).

Method 2: Damp-wipe surfaces with plain water or use a wood floor cleaner: scrub as needed.

Update: 2011-04-13 Last changes in red

Method 3: High-efficiency particulate air (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

Minimum personal protective equipment to be worn during clean-up includes gloves, N-95 respirator and goggles/eye protection.

Medium - Total Surface Area Affected Between 10 and 100 Square Feet Cleanup Methods

Before applying AntiBlu IP75 and BORA-CARE, visible mold growth must be removed and conditions favorable to mold growth must be identified and corrected. Use one of the following or another preferred professional method.

Wood Surfaces

Method 1: Wet vacuum (in the case of porous materials some mold spores/fragments remain in the material but will not grow if the material is completely dried or treated).

Method 2: Damp-wipe surfaces with plain water or use a wood floor cleaner; scrub as needed.

Method 3: High-efficiency particulate air (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

Wallboard (drywall and gypsum board)

Before applying AntiBlu IP75 and BORA-CARE, visible mold growth must be removed and conditions favorable to mold growth must be identified and corrected. Clean affected areas using high-efficiency particulate air (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

Use limited or full personal protective equipment during cleanup. Limited personal protective equipment includes gloves, N-95 respirator or half-face respirator with HEPA filter, disposable overalls and goggles/eye protection. Full personal protective equipment includes gloves, disposable full body clothing, head gear, foot coverings, and a full-face respirator with HEPA filter.

Use professional judgment to determine the appropriate level of Personal Protective Equipment (PPE) considering the potential for remediator exposure and size of contaminated area.

Large - Total Surface Area Affected Greater Than 100 Square Feet or Potential for Increased Occupant or Remediator Exposure During Remediation Estimated to be Significant Before applying AntiBlu IP75 and BORA-CARE, visible mold growth must be removed and conditions favorable to mold growth must be identified and corrected. Use one of the following or another preferred professional method.

Wood Surfaces

Method 1: Wet vacuum (in the case of porous materials, some mold spores/fragments will remain in the material but will not grow if the material is completely dried.

Method 2: Damp-wipe surfaces with plain water or with a wood floor cleaner; scrub as needed.

Method 3: High-efficiency particulate (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

Method 4: Discard/remove water-damaged materials and seal in plastic bags while inside of containment, if present. Dispose of as normal waste. HEPA vacuum area after it is dried.

Wallboard (drywall and gypsum board)

Method 1: High-efficiency particulate (HEPA) vacuum after the material has been thoroughly dried. Dispose of the contents of the HEPA vacuum in well-sealed plastic bags.

Update: 2011-04-13 Last changes in red

Method 2: Discard/remove water-damaged materials and seal in plastic bags while inside of containment, if present. Dispose of as normal waste. HEPA vacuum area after it is dried.

Wear PPE including gloves, disposable full body clothing, head gear, foot coverings, full-face respirator with HEPA filter. Select method most appropriate to situation. Since molds gradually destroy the things they grow on, if mold growth is not addressed promptly, some items may be damaged such that cleaning will not restore their original appearance. If mold growth is heavy and items are valuable or important, you may wish to consult a restoration/water damage remediation expert.

Containment of Affected Materials

Total Surface Area Affected Between 10 and 100 Square Feet (all surfaces)
Use polyethylene sheeting ceiling to floor around affected area with a slit entry and covering flap;
maintain area under negative pressure with HEPA filtered fan unit. Block supply and return air vents
within contaminated area.

Total Surface Area Affected Greater than 100 Square Feet or Potential for Increased Occupant or Remediator Exposure During Remediation Estimated to be Significant

Use two layers of fire-retardant polyethylene sheeting with one airlock chamber. Maintain area under negative pressure with HEPA filtered fan exhausted outside of building. Block supply and return air vents within containment area.

Special procedures and training are required for remediation of moldy areas larger than 10 square feet Consult guidelines for remediation of large areas established by the Indoor Air Quality Association (www.iaga.org) and the U.S. Environmental Protection Agency (www.epa.gov). An excellent reference is the New York Department of Health publication, "Guidelines on Assessment and Remediation of Fungi in Indoor Environments." An excellent guide for professional mold remediation is available from the Institute of Inspection, Cleaning and Restoration Certification (IICRC). Standard S520 is based upon reliable remediation and restoration techniques, and combines academic principles with practical elements in water damage restoration. When structural members and/or contents have been exposed to water in excess of 24 hours, there is a possibility of extensive microbial growth that may be hidden. In such a case, a complete assessment and remediation plan must be prepared that provides for user and occupant safety and documentation and monitoring of the remediation process. IICRC S520 contains excellent guidance for such a plan. In the context of such a plan, AntiBlu IP75 and BORA-CARE can be used on materials to be removed and disposed of and in other applications where mold inhibition is indicated. The IICRC Standard S520 must be followed exactly and all growth and contaminated organic material removed prior to using AntiBlu IP75 and BORA-CARE. Before using AntiBlu IP75 and BORA-CARE in mitigation of large projects, read these guidelines and follow them to the extent feasible and applicable.

In the absence of access to the guidance and standards identified, refer to the information in the U.S. EPA's guide - Mold Remediation in Schools and Commercial Buildings (March, 2001). These guidelines are based on the area and type of material affected by water damage and/or mold growth. Please note that these are guidelines; some professionals may prefer other cleaning methods. Use appropriate remediation steps prior to application of AntiBlu IP75 and BORA-CARE.]