

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 21, 2017

Susan Stracquatanio, Agent System Three Resins, Inc. c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904

Subject: Notification per PRN 98-10 –Adding graphics to the master label

And removing words but not limited to as requested by CDPR

Product Name: EndRot Borate Powder EPA Registration Number: 65105-2 Application Date: November 20, 2017

Decision Number: 536010

Dear Ms. Stracquatanio,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, you may contact Lorena Rivas at 703-305-5027 or via email at rivas.lorena@epa.gov.

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Sincerely,

Registration Risk Manager Regulatory Management Branch II Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure: Notification Label

NOTIFICATION

65105-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

12/21/2017

a SYSTEM THREE product

EndRot Borate Powder

PROTECTS WOOD AGAINST FUNGAL DECAY AND WOOD-DESTROYING INSECTS INCLUDING TERMITES AND CARPENTER ANTS

> Active Ingredient: Disodium Octaborate Tetrahydrate (Na₂B₈O₁₃).......98% **TOTAL** 100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

Have the product container or label with you when calling a poison control center of doctor, or going for treatment.

If Swallowed: Call a 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 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 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.

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.

In case of chemical emergency call: CHEMTREC (24 HOURS) 800 424-9300

Manufactured by: SYSTEM THREE RESINS, INC. 3500 W. Valley Hwy., N. Ste. 105 Auburn, WA 98001

EPA Reg. No. 65105-2

EPA Est. No.

NET CONTENTS: 1 pound [lb.] or [2 ounces [oz.]]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

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

Read entire contents of this label before product use.

EndRot Borate Powder is a water soluble, inorganic borate salt with insecticidal and fungicidal properties effective against wood-destroying organisms including the target pests listed below. Apply EndRot Borate Powder as a liquid solution or powder. EndRot Borate Powder is an effective treatment for wood (and wood-foam composite structural components) to kill and prevent infestations of decay fungi including white rot, brown rot (i.e., Poria) and wet rots. This product may be used for preventative treatment (before signs of infestation), for wood in existing structures and for remedial treatment of infested wood in existing structures. EndRot Borate Powder is also effective for the prevention and control of wood destroying insects such as the following organisms: Subterranean Termites (Reticulitermes, Heterotemes, Coptotermes (Formosan)), Drywood Termites (Kalotermes, Incisitermes), Dampwood Termites (Zootermopis), Powderpost Beetles (Lyctidae), "False" Powderpost Beetles (Bostrichidae), Deathwatch and Furniture Beetles (Anobiidae), Old House Borers, Longhorn Beetles (Cerambycidae), Carpenter Ants (Camponotus), Bark and Timber Beetles (Scolytidae).

APPLICATION

[For 1 pound container:]

Mix 1 pound of EndRot Borate Powder per 1 gallon of water, stir until dissolved. The solution can be applied by brush, spray, or dip. Apply at the rate of approximately 150 square feet per gallon. For wood 2 inches or greater in thickness, apply a second coat 6 to 24 hours later. EndRot Borate Powder can also be applied by drilling holes into the wood and pouring the solution into the holes.

Alternatively, apply dry End Rot Borate Powder to infested areas by drill and injection directly into galleries or dust wood surfaces and wall voids at a rate of 1 pound per 40 sq. ft.

[For 2 ounce pouch:]

Mix 2 ounces of EndRot Borate Powder per 1 pint of water, stir until dissolved. The solution can be applied by brush, spray, or dip. Apply at the rate of approximately 19 square feet per pint. For wood 2 inches or greater in thickness, apply a second coat 6 to 24 hours later. EndRot Borate Powder can also be applied by drilling holes into the wood and pouring the solution into the holes. Alternatively, apply dry End Rot Borate Powder to infested areas by drill and injection directly into galleries or dust wood surfaces and wall voids at a rate of 2 ounces per 5 sq. ft.

EndRot Borate Powder is recommended for wood and cellulose material in accordance with the specific treatment methods described herein. EndRot Borate Powder is effective for all interior and exterior wood (and wood-foam composite structural components) that will be protected from excessive rain and not in direct contact with the soil. Types of wood include, but are not limited to, all types of lumber, logs and plywood. This product kills wood-destroying organisms. Some etching of treated wood may occur from organisms before they die. Do not apply EndRot Borate Powder to wood or cellulose material that

has been painted, varnished or sealed. For best results, apply EndRot Borate Powder to bare wood. Use soap and water to clean application equipment.

Note: Spraying water on some wood species can mobilize natural wood extractives, raise the grain and leave behind calcium or other deposits. Prior to treating large areas, treat a small area with EndRot Borate Powder solution, allow to dry and evaluate appearance.

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 can gain access.

[Use the following statement for 1 lb. plastic jar:]

PESTICIDE DISPOSAL and CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Use the following statement for 2 oz. plastic pouch:]

PESTICIDE DISPOSAL and CONTAINER HANDLING: If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY

Manufacturer warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated on the label only when used in strict accordance with the directions under normal conditions of use. In abnormal conditions, System Three Resins, Inc. makes no other expressed or implied warranties or merchantability or fitness of purpose. Product sold without guarantee. Manufacturer's sole liability shall be limited to the replacement of product.



[Information in brackets is optional or alternate text; italics in brackets indicate instructions not a part of labeling.]