

70114-1

4/14/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

APR 14 2014

OFFICE OF CHEMICAL
SAFETY AND POLLUTION
PREVENTION

Michael Kellogg, Agent for Wood Care Systems
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbour, WA. 98332

Subject: Bor-Rods
EPA Registration Number: 70114-1
Application Date: April 8, 2014
EPA Pin Punch Date: April 10, 2014

Dear Mr. Kellogg:

This acknowledges receipt of your Notification submitted in accordance with the provisions of Pesticide Registration Notice 98-10 and 40 CFR 152.46 under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9.

Proposed Notification

- Addition of new size of rod 10 mm by 100mm.

General Comments

- Based on a review of the material submitted, the Notification is acceptable.

Should you have any questions about this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,

A handwritten signature in black ink that reads "Tom Luminello".

Handwritten initials "JH" in black ink, positioned to the left of the typed name.

Jacqueline Hardy
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|--|--|--|
| 1. Company/Product Number 70114-1 | 2. EPA Product Manager J. Campbell | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Wood Care Systems / Bor-Rods | PM# 34 | |
| 5. Name and Address of Applicant (Include ZIP Code) Wood Tec, Inc. d/b/a Wood Care Systems c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____ | |

Section - II

| | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application. |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below. |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of a label notification adding an additional rod size per PR Notice 98-10. The alternate brand name is "Bor-8 Rods". This notification is consistent with the provisions of PR 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

| | | | | | |
|---|--|---|---|--|---|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | <input type="checkbox"/> Metal | <input checked="" type="checkbox"/> Plastic |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt. No. per container | <input type="checkbox"/> Glass | <input type="checkbox"/> Paper |
| | | | | <input type="checkbox"/> Other (Specify) _____ | |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container 6,12,24,100,350,500,750,1000,1500 | | 5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product | |
| 6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled | | | | <input type="checkbox"/> Other _____ | |

Section - IV

| | | |
|---|----------------|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | |
| Name Michael Kellogg | Title Agent | Telephone No. (include Area Code) (253) 853-7369 |
| 2. Signature | | 6. Date Application Received (Stamped) |
| 3. Title Agent | | |
| 4. Typed Name Michael Kellogg | | |
| 5. Date 4/8/14 | | |

PYXIS REGULATORY CONSULTING, INC.

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4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

April 8, 2014

COURIER DELIVERY

Jacqueline Campbell (PM 34)
Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Wood Tec Inc. D/B/A Wood Care Systems – Bor-Rods (EPA Reg. No. 70114-1)
Notification of an Additional Rod Size per PRN 98-10

Dear Ms. Campbell,

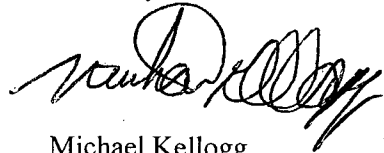
On behalf of Wood Care Systems, please find the enclosed notification of an additional rod size being added to the Bor-Rods label per PRN 98-10. The additional rod size is 0.39” x 3.9” (10 mm x 100 mm) as shown on the enclosed Bor-Rods label.

In support of this notification submission, we submit the following documents:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. One (1) copy of the Bor-Rods labeling with changes tracked
- 3. One (1) copy of the Bor-Rods labeling with changes incorporated
- 4. Certification with Respect to Label Integrity
- 5. One (1) copy of the Bor-Rods labeling on CD
- 6. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Michael Kellogg
Agent for Wood Care Systems

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Enclosures

cc: J. Renfroe; Wood Care Systems

BOR-RODS®

Protects Wood Against Fungal Decay
Solid Wood Preservative

ACTIVE INGREDIENTS:

Anhydrous Disodium Octaborate (Na₂B₈O₁₃) 96.65%
(Boric Oxide Equivalent 79.0)

OTHER INGREDIENTS:..... 3.35%

TOTAL: 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

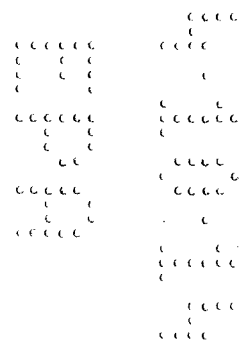
| FIRST AID | |
|--|--|
| If swallowed: | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If in eyes: | <ul style="list-style-type: none"> • 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 or clothing: | <ul style="list-style-type: none"> • 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. |
| HOTLINE NUMBER | |
| Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-827-3480 for emergency medical treatment information. | |

EPA Reg. No. 70114-1

- EPA Est. No. 64910-FL-001
- EPA Est. No. 70114-WA-001
- EPA Est. No. 70815-GA-001
- EPA Est. No. 87502-IND-001

Quantity: _____

Rod Size _____



WOOD CARE SYSTEMS

719 Kirkland Ave.
 Kirkland, WA 98083
 Phone (425) 827-6000
 Fax (425) 822-5800
www.ewoodcare.com

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear gloves when handling Bor-Rods. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

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 washwater or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. READ THE ENTIRE LABEL BEFORE USE.

APPLICATIONS TO WOOD AND WOOD PRODUCTS

Use Bor-Rods for remedial and preventative treatment against fungal decay on wood and wood products such as lumber, timbers, logs, millwork, poles, piles, posts, crossties, laminated beams, etc. Insert Bor-Rods into decaying wood or wood in high-risk areas through drilled holes as instructed below.

The application rate for Bor-Rods is 6.0 ounces of boric Acid Equivalent (BAE) per cubic foot of wood for remedial treatments and 2.0 ounces of BAE per cubic foot of wood for preventative treatments. Bor-Rods contain 1.4 ounces of BAE per ounce. The following table shows the BAE for each size of Bor-Rods.

BOR-ROD SIZES, WEIGHTS and Boric Acid Equivalent (BAE)

| Bor-Rod Size | Weight (ounces) | BAE (ounces) |
|----------------------------------|-----------------|--------------|
| 1/4" x 1/2" | 0.03 | 0.04 |
| 1/3" x 1" | 0.09 | 0.13 |
| 1/3" x 2 5/8" | 0.26 | 0.36 |
| 1/2" x 2" | 0.45 | 0.63 |
| 0.39" x 3.9" (10 mm x 100 mm) | 0.62 | 0.87 |
| 1/2" x 4" | 0.87 | 1.22 |
| 3/4" x 3" | 1.52 | 2.13 |

Bor-Rods can be inserted into any wood surface in a staggered, linear or angled pattern. Drill appropriate sized holes to accommodate the predetermined number and size of Bor-Rods required. Drill holes 1/16" larger in diameter than the rod and deep enough to allow for a plug and 1/8" extra length for expansion. Place the rods so that they will be in the most likely place to get wet and diffuse into the desired areas to be treated. Do not space rods more than 12" apart along the grain or 4" apart across the grain.

To calculate the number of Bor-Rods required:

1. Calculate the cubic footage of wood to be treated. Note that it is not always necessary to treat the entire wood member, so only calculate the amount of wood you intend to treat.
 - a. To Calculate Cubic Footage in dimensional lumber, use the following formula:

$$\text{Volume} = (\text{Thickness} \times \text{width} \times \text{length of wood to be treated (all in inches)}) \div 1728$$
 - b. To Calculate Cubic Footage in round wood, use the following formula:

$$\text{Volume} = (\text{pi (3.14)} \times (\text{radius squared}) \times \text{length of wood to be treated}) \div 1728$$
2. Once the cubic footage of wood to be treated is known, use this information to calculate the number of Bor-Rods needed for application.
 - a. For BAE loading to arrest existing decay, multiply the cubic footage by 6 to determine how many ounces of BAE it will take to treat the cubic feet of wood that has been calculated.
 - b. For BAE loading to prevent decay, multiply the cubic footage by 2 to determine how many ounces of BAE it will take to treat the cubic feet of wood that has been calculated.
3. To determine the number of rods needed for treatment, divide the cubic footage by the BAE content of the rod size you want to use.

See your Wood Care Systems dealer for other borate based wood preservatives as well as the complete line of wood restoration products.

STORAGE AND DISPOSAL

For Residential/Homeowner Use:

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Securely wrap original container in several layers of newspaper and discard in trash or offer for recycling if available.

For Commercial Use:

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

PESTICIDE STORAGE: Store in dry conditions at all times and out of the reach of children.

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

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONDITIONS OF SALE AND WARRANTY

Wood Care Systems warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. **Wood Care Systems MAKES NO OTHER EXPRESSED OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by buyer or user are beyond the control of Wood Care Systems. Risks such as ineffectiveness or other unintended

consequences resulting from, but not limited to, failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL Wood Care Systems BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

BOR-ROD is a registered trademark of Wood Care Systems

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