

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

October 5, 2022

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Jeremy D. Malone Agent Wood Care Systems c/o Spring Regulatory Sciences 6620 Cypresswood Drive, Suite 250 Spring, TX 77379 Jeremy@springregulatory.com

Subject: Notification per PRN 98-10 – Minor Labeling Revisions Product Name: BOR-RODS EPA Registration Number: 70114-1 Received Date: 03/10/2021 Action Case Number: 00294146

Dear Mr. Malone:

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) lists 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 Assurance.

If you have any questions, you may contact Terria Northern via email at northern.terria@epa.gov.

Sincerely,

Stacey Grizog

f/ Terria Northern, Team 34 Regulatory Risk Manager Regulatory Management Branch II Antimicrobials Division (7510M)

[Denotes Optional Text] {Denotes Notes to EPA Reviewer}

BOR-RODS

NOTIFICATION

70114-1

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:

09/29/2022

Protects Wood Against Fungal Decay Solid Wood Preservative

ACTIVE INGREDIENTS:	
Anhydrous Disodium Octaborate (Na ₂ B ₈ 0 ₁₃)	
(Boric Oxide Equivalent 79.0)	
OTHER INGREDIENTS:	<u>3.35</u> %
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID		
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 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. Calf a poison control center or doctor for 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.	
HOTLINE NUMBER		
-	container or label with you when calling a poison control center or treatment. You may also contact 1-800-827-3480 for emergency	

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. 64910-WA-001 EPA Est. No. 8748964910-GA-001 EPA Est. No. 64910-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 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 hot 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.

DOIN-ROD SIZES, WEIGHTS and Doine Acid Equivalent (DAE)			
Bor-Rod Size	Weight	BAE	
	(ounces)	(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	
<u>0.39" x 3.9"</u>	<u>0.62</u>	<u>0.87</u>	
<u>(10 mm x 100 mm)</u>			
1/2" x 4"	0.87	I .22	
3/4" x 3"	1.52	2.13	

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

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 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 <u>dimensional lumber</u>, use the following formula: Volume = (Thickness x width x length of wood to be treated (all in inches)) ÷ 1728.
- b. To Calculate Cubic Footage in <u>round wood</u>, use the following formula: Volume = (pi (3.14) x (radius squared) x length of wood to be treated) ÷ 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 <u>arrest existing decay</u>, 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 <u>prevent decay</u>, 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

EPA 20140408