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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

03-31-2004


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

 OFFICE OF
 PREVENTION, PESTICIDES
 AND TOXIC SUBSTANCES

March 31, 2004

 Gail Early
 Regulatory Specialist
 ISK Biocides, Inc.
 416 East Brooks Road
 Memphis, TN 38109

 Subject: Tuffbrite
 EPA Registration No. 71581-5
 Application Date: January 16, 2004
 EPA Received Date: January 20, 2004

Dear Ms. Early:

The following amendment, submitted under connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable:

Proposed Amendment

- Revised labeling to include directions for use in paint and stain films, adhesives, caulks, and sealants
- Addition of recommendation for constant agitation during sapstain control use

General Comments

A stamped copy of the accepted labeling is enclosed. Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,

 Adam Heyward
 Product Manager 34
 Regulatory Management Branch II
 Antimicrobials Division (7510 C)

CONCURRENCES							
SYMBOL	7510C						
SURNAME	Early						
DATE	3-31-04						

Net Contents:

TUFF-BRITE ®

**For Control of Sapstain and Mold in
Freshly Cut Lumber and Timbers and
Decay Protection in Wood Composites**

**To Impart Mildew Control on Paint and Stain Films,
Adhesives, Caulks and Sealants**

FOR INDUSTRIAL USE ONLY

Read Entire Label Carefully and Use Only as Directed

Ingredient Statement

Active Ingredient:

Chlorothalonil (tetrachloroisophthalonitrile). 40.4%

Inert Ingredients: 59.6%

Total: 100.0%

Patent Pending

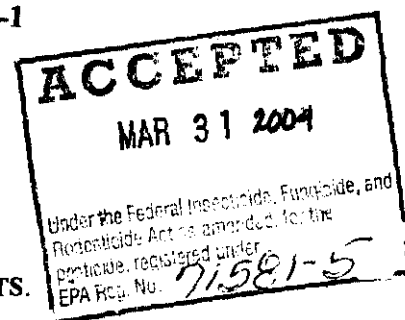
EPA Reg. No. 71581-5

EPA Est. No. 1022-TN-1

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.



**ISK BIOCIDES, INC.
416 EAST BROOKS ROAD
MEMPHIS, TN 38109 USA**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Causes eye irritation.
May cause skin irritation.
May be a potential skin sensitizer.

DO NOT get in eyes. Wear goggles or face shield when handling this product.

Avoid prolonged contact with skin. Wash exposed areas of skin with soap and warm water after handling or using. Remove contaminated clothing and wash before reuse.

Avoid breathing spray mist. **DO NOT** take internally.

Note to User: This product may produce temporary allergic side effects characterized by redness of the eyes, mild bronchial irritation and redness or rash on exposed skin areas. Persons having allergic reaction should contact a physician.

FIRST AID	
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. ▪ 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 further treatment advice.
HOT LINE NUMBER	
<p>In case of emergency, call Chemtrec toll free at 800-424-9300.</p> <p>Have the product container or label with you when calling a poison control center or doctor or going for treatment.</p>	
<p>NOTE TO PHYSICIAN: Persons having a temporary allergic reaction respond to treatment with antihistamine or steroid creams and/or systemic steroids.</p>	

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic vertebrates, and marine/estuarine organisms. Run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. **DO NOT** contaminate water when disposing of equipment washwaters.

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.

DIRECTIONS FOR USE

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

APPLY ONLY AS SPECIFIED ON THIS LABEL

WOOD PROTECTION:

General: TUFF-BRITE® is a liquid formulation to be dispersed in water for control of sapstain and mold in freshly sawed lumber and timbers and decay protection in wood composites. The dispersion in water may be applied by dip or a coarse spray. Shake or mix the concentrate well before dispersing in the water.

Constant (24-hour) agitation is required in the dip vat, pre-mix tank, or nurse tank to maintain adequate distribution of the treatment material. Agitation should continue even when no treatment operation is occurring, such as overnight and on weekends.

Lumber Treatment: For lumber approximately 2" (50 mm) or less in thickness, use 1 quart (a liter) per 100 gallons (378 liters) of water. Dip or spray the lumber until all surfaces are thoroughly wet.

Timber Treatment: For timbers or lumber thicker than 2" (50 mm), use 2 quarts (2 liters) per 100 gallons (378 liters) of water. Measure the chemical and water accurately. Dip or spray until all surfaces are thoroughly wet.

Seasoned Wood Treatment: For control of mildew fungi on seasoned wood above ground, mix 1 to 2 1/2 gallons of TUFF-BRITE with 100 gallons of water, water repellent, or latex coating, and apply by brush or spray.

Proper Handling of Treated Lumber and Timbers: For best results, use fresh logs as free from infection as possible before converting into lumber. Treat the lumber as soon as possible (within 12 to 24 hours) after cutting. Place lumber and timbers on sticks if possible for rapid air seasoning. Protect freshly treated lumber from excessive rainfall immediately after treatment.

Note #1: If possible, dipping is better than spraying for complete coverage of all surfaces.

Note #2: Bulk piled lumber and timbers should always use the stronger mixture.

Composite Wood Products:

To provide decay protection for composite wood products, such as flakeboard or particle board that is to be used for building siding, sheathing, construction timbers, decking or

planking, incorporate Tuff-Brite into the wood composite material while it is being manufactured. Use 1.25 to 12.5 pounds of Tuff-Brite per cubic foot volume of final wood composite. The high loading rate should be used in composite wood products that are intended to be installed in contact with soil or concrete, or where the wood is intended to be exposed to conditions with continuously high levels of moisture. Thoroughly incorporate Tuff-Brite into the composite material as it is being ground, mixed or blended with adhesives or binding materials prior to final formation of the wood composite matrix.

For Pressure Treatments:

APPLY WITH CCA PRESSURE TREATMENT: Add 0.2 – 0.4 gallons of Tuff-Brite to 100 gallons of CCA treating solution ready to use. Pressure treat wood or lumber by the standard procedure of American Wood Preservers' Association.

APPLY BEFORE PRESSURE TREATMENT: Dip wood in a vat containing 0.2 - 0.4 gallons of Tuff Brite to 100 gallons water. This is to control mold while wood is air drying. CCA pressure treating may be done immediately following the dip treatment if desired.

APPLY AFTER CCA PRESSURE TREATMENT: Dip CCA-treated wood in a vat containing 0.2 – 0.4 gallons of Tuff Brite to 100 gallons of water. This may be done as soon after pressure treatment as desired.

PAINT& STAIN FILMS, ADHESIVES, CAULKS AND SEALANTS:

This product is used to protect treated articles from decay, mold or mildew, including paints and stains, adhesives, caulks, grouts and sealants.

This product must not be sold as a mildewcidal paint additive designed for direct sale to retail customers, e.g. in a "pillow pack" or other small volume or one-use package.

This product may be added only to paint products that are labeled

- A) with product-specific instructions for the use of a respirator during application, or
- B) as follows: "When applying with a sprayer, wear a NIOSH approved respirator with any R, P, or HE filter". (If oil is not present in the paint product or recommended for use as an additive in the paint product, add "N" as an additional respirator type.)

This product must not be used as an in-container preservative.

Mix contents slowly before using to assure uniform mixture. Tuff-Brite is an aqueous dispersion containing 40.4% (wt/wt) active ingredient. Tuff-Brite is to be used in water-based or water-compatible products only.

Latex Emulsion Paints, Stains and Coatings:

Disperse 12.4 to 24.8 pounds (9.6 to 19.3 pints) of Tuff-Brite per 100 gallons of exterior paint to obtain effective mildew control in the paint film after it is applied. Use the high rate in areas favorable to mildew and mold growth, such as where painted surfaces frequently are warm and moist. Tuff-Brite, when added to stains designed for exterior wood, also protects the wood from surface molds and mildew stains caused by fungi.

Use 6.2 to 12.4 pounds (4.8 to 9.6 pints) of Tuff-Brite per 100 gallons of interior latex paint.

Tuff-Brite is compatible with zinc oxide in latex paints.

Tuff-Brite can be used with either unmodified or alkyd modified acrylic, vinyl acrylic, or polyvinyl acetate latexes.

Tuff-Brite can be added into the paint formula during the pigment grind operation, during or after letdown, or post-added to a finished paint product after manufacture.

Note: If Tuff-Brite is used to produce post-manufacturing paint additive products, such products must be distributed to and used by only professional personnel engaged in the mixing or blending of such paints. Such post-manufacturing paint additive products may not be sold directly to homeowners or non-professional painters.

If an in-can preservative is used in combination with Tuff-Brite, its compatibility with Tuff-Brite should be examined first.

DO NOT use in paints designed for applications on food-contact surfaces, or on the interior of buildings engaged in food processing or food handling. DO NOT use in paints designed to be handled by children.

Aqueous Adhesives

Tuff-Brite may be incorporated into adhesives to protect the applied adhesive films from mold growth and decomposition. Fully disperse 12.4 to 24.8 pounds of Tuff-Brite per 1,000 pounds of adhesive while it is being manufactured. Use the high rate in areas favorable to mildew and mold growth, such as where surfaces frequently are warm and moist.

DO NOT use in adhesives designed for applications on food-contact surfaces, or on the interior of buildings engaged in food processing or food handling.

Aqueous Caulks and Sealants

To provide mildew and mold control on caulking or sealing deposits after application, fully disperse 1.25 to 12.5 pounds of Tuff-Brite per 1,000 pounds of caulk or sealant products while they are being manufactured. The high rate is recommended for exterior caulks.

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DO NOT use in caulks or sealants designed for applications on food-contact surfaces, or on the interior of buildings engaged in food processing or food handling.

KEY POINTS ON SAFETY AND USE

KEEP OUT OF REACH OF CHILDREN

Do Not Take internally

Do Not Store near Foodstuffs

This Product is Toxic to Fish

Furnish Protective Clothing and Goggles to Workers

Instruct Workers to Use Good Hygiene And Always Wash Hands Before Eating or Drinking.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool place. Protect from excessive heat.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, pesticide spray 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.

CONTAINER DISPOSAL: DO NOT reuse empty container. Triple rise (or equivalent). The offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL: Consult Federal, State, or local disposal authorities for approved alternative procedures.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants to those persons lawfully acquiring title to this product that at the time of the first sale of this product by seller this product conformed to its chemical description and that it was reasonably fit for the purposes stated on the product label when used both in accordance with the Direction for Use appearing on the product label and under normal conditions of use. Buyers and users of this product assume the risk of all loss or damage from use or handling of this product that results from their failure to read and comply with the Directions for Use of this product which appear on the product label. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. Unless expressly prohibited by state law, the liability of seller for any breach of warranty shall not exceed the purchase price of the product as to which a claim is made.