

PM 34

71653-1

11/5/99

page 18

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Dr. Jim Hill, Agent for
Genics Can, Inc.
SRS International Corporation
1625 K Street, N.W., Suite 1000
Washington, D.C. 20006

NOV - 5 1999

Dear Dr. Hill:

Subject: Minor label change
Genics Cobra Wrap™
EPA Registration No. 71653-1
Your submission of October 8, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

The statement (2% copper metal) must be deleted from the ingredient statement and place as a foot note to the ingredient statement. The foot note should read: "Contains 2% copper as metal".

If you have any questions concerning this letter, please contact Portia Jenkins at 703-308-6230.

Sincerely yours,

for Adam Heyward, Jenkins

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

Enclosure

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

**PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS
AND DOMESTIC ANIMALS**

WARNING

Harmful if swallowed or absorbed through skin, causes skin irritation. Do not get into eyes, on skin or on clothing. Avoid breathing vapour. Use in well-ventilated area.

FIRST AID STATEMENT

IF SWALLOWED: Do not induce vomiting. CALL PHYSICIAN IMMEDIATELY.

IF INHALED: Remove to fresh air.

IF IN EYES: Flush with plenty of water and get immediate medical attention.

IF ON SKIN: Wash hands with vegetable oil or hand degreaser and then thoroughly with soap and water.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, in areas where surface water is present or to intertidal area below the mean high water mark. Do not contaminate water when disposing of equipment wash waters. Do not discharge effluent containing this product into lakes, streams, 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 EPA Office.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame. Use only with adequate ventilation.

STORAGE AND DISPOSAL

Product will not freeze. Store at temperatures between 0°F and 120°F 18°C and 50°C. If product has been spilled, spread absorbent, pick up and place in containers. DO NOT STORE opened packages. **DISPOSAL:** Wrap any cut portion of COBRAWRAP™ and put into trash collection.

COBRAWRAP™

WOOD PRESERVATIVE COMMERCIAL

WOOD EXTERIOR SURFACE
WRAP FOR ABOVE OR BELOW
GROUND TREATMENT FOR
POLES, POSTS AND PILINGS

KEEP OUT OF REACH
OF CHILDREN
WARNING
COMBUSTIBLE
HARMFUL IF SWALLOWED
See other precautionary statements
on side panels

CONTAINS INGREDIENTS LISTED BELOW SATURATED IN SYNTHETIC ABSORBENT CLOTH ENSAPSULATED IN CHEMICAL AND VAPOUR RESISTANT CONTAINERS WITH AN ADDITIONAL CHEMICAL RESISTANT VAPOUR BARRIER EXTERIOR.

ACTIVE INGREDIENT:

Copper naphthenate (2% copper as metal).....	17.80
INERT INGREDIENTS	82.20
TOTAL	100%

Net Contents: 9.5 oz. each 9" pouch

EPA Reg. No. 71653-1
EPA EST. NO. 71653-CAN-001

GENICS INC.
561 Acheson Road
53016 Hwy 60
Sp. uca Grove, AB. T7X 3G7
Tel: (730) 962-1000
Fax: (780) 962-1052

Patent Protected:
USA
Canada

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV - 5 1999

Under the Federal Insecticide
Fungicide, and Rodenticide Act
amended, for the purpose
registered under FIFRA

DIRECTIONS FOR USE:

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

FOR EXTERIOR USE ONLY

CONTINUOUS ROLL

COBRAWRAP™ containing copper naphthenate is intended for use only on poles, posts and pilings as a wood preservative treatment. COBRAWRAP™ containing copper naphthenate provides protection against moisture, fungal rot and termite damage. This copper naphthenate wood preservative and insecticide will preserve, protect and seal wood surfaces that will be in contact with soil or concrete. Depending upon climatic conditions, species of wood to which applied, moisture and humidity, treatment extends service life several years.

PREPARATION AND APPLICATION

Wood should be clean, dry, well seasoned and free of bark. When using COBRAWRAP™ as a groundline treatment excavate around wood to allow top of wrap to extend 2" (5cm) above groundline.

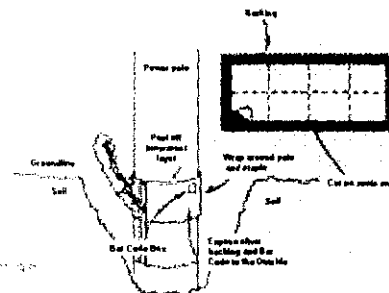
Protect eyes and skin from contact.

Wire brush area 3" (7.5cm) above groundline and approximately 20" (50cm) below groundline removing dirt and decayed material.

Cut off sufficient length of COBRAWRAP™ leaving 2" - 6" (5cm - 15cm) of wrap to serve as overlap. Lay on ground exposing the pouches of preservative. Peel off top layer exposing the leakable layer below. On the overlap portion leave a sufficient tail attached to the outermost edge forcing preservative to move back into wood zone for penetration.

Wrap proper length COBRAWRAP™ around the pole with saturated pad against the pole and staple or tack firmly in place. Staple short side of the backing first and overwrap with longer edge. Allow wrap to extend 2" (5cm) above groundline.

Backfill excavation, tamping firmly.



22