

71653-1

05/30/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

MAY 30 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Dr. Jim T. Hill
SRS International Corporation
Registration Agent for Genics, Inc.
1901 L Street, N.W. Suite 250
Washington, DC 20036

Subject: Revised label
COBRA™ WRAP
EPA Registration No. 71653-1
Your Application Dated April 3, 2002

Dear Dr. Hill:

This is a follow-up to the EPA letter dated May 6, 2002. The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with comments:

- label amendments per PR Notice 2001-1
- addition of the brand name "Cobra™ Wrap SD"
- non-notification per PR Notice 98-10 (size & net contents)

General Comments

- The alternate brand name "Cobra™ Wrap SD" is acceptable. (See EPA letter of 05/06/02).
- The non-notification for package size & net contents has been inserted in your file for future reference. (See EPA letter of 05/06/02).

Label Comments

1. With respect to the labeling, remove the word "Combustible" from the keep out of reach of children statement and place it under the following subheading to read:

PHYSICAL OR CHEMICAL HAZARDS

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2. The storage and disposal statement must be revised to read as follows:

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal

PESTICIDE STORAGE: Store at temperatures between 64°F (18°C) and 120°F (50°C). DO NOT STORE opened pouches.

PESTICIDE DISPOSAL: If product has been spilled, spread absorbent, pick up and place in containers. Dispose of according to state and local regulations.

CONTAINER DISPOSAL: Wrap any cut portion of product in paper and put into trash.

Refer to PR Notice 83-3.

3. Delete the additional brand name "Cobra™ Wrap SD" from the master label.

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely yours,

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

Enclosure

CONCURRENCES							
SYMBOL							
SURNAME							



MASTER LABEL

(Front Panel)

Primary Name

Alternate Name

COBRA™ WRAP

COBRA™ WRAP SD

WOOD PRESERVATIVE COMMERCIAL

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

COMBUSTIBLE

HARMFUL IF SWALLOWED

See other precautionary and first aid 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*	17.80
INERT INGREDIENTS**	82.20
TOTAL	100%

* 2% copper as metal

**Contains Petroleum Distillates

Net Contents: 9.5 oz. each 9" pouch

Net Contents: 6.8 oz. each 6" pouch

EPA Reg. No. 71653-1

EPA EST. No. 71653-CAN-001

Patent Protected

USA

Canada

GENICS INC.

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Spruce Grove, AB T7X 3G7

Tel: (780) 962-1000

Fax: (780) 962-1052

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

MAY 30 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No

71653-1

(Side/Back Panel)

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin, causes moderate eye irritation. Avoid breathing vapour. Use in well ventilated area. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash prior to reuse.

FIRST AID STATEMENT

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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 five minutes, then continue to rinse. 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 further treatment advice.

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

Note to Physician: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

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 64°F (18°C) and 120°F (50°C). If product has been spilled, spread absorbent, pick up and place in containers. Dispose of according to state and local regulations. DO NOT STORE opened pouches.

DISPOSAL: Wrap any cut portion of product in paper and put into trash collection.

(Side/Back Panel)

Cobra™ WRAP

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 [52.5 ft.]

Cobra™Wrap containing copper naphthenate is intended for use only on poles, posts and pilings as a wood preservative treatment. Cobra™Wrap 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

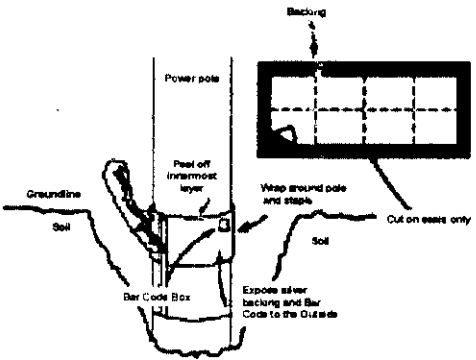
Wood should be clean, dry, well seasoned and free of bark. When using Cobra™Wrap as a groundline treatment excavate around wood to allow top of wrap to extend 2" (5cm) above groundline.

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 Cobra™Wrap 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 Cobra™Wrap 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.



(Side/Back Panel)

Cobra™ WRAP SD

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 [52.5 ft.]

Cobra™Wrap SD containing copper naphthenate is intended for use only on poles, posts and pilings as a wood preservative treatment. Cobra™Wrap SD 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 Cobra™Wrap SD 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 18" (45cm) below groundline removing dirt and decayed material.

Cut off sufficient length of Cobra™Wrap SD leaving 2" - 6" (5cm - 15cm) of wrap to serve as overlap. Lay on ground exposing the pouches of preservative. Cut open pouches by slicing diagonal lines every 3 to 4 inches through the inner plastic layer, exposing the saturated pads. 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 Cobra™Wrap SD 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.

