

71653-2

12/07/2005

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

	United States <b>Environmental Protection Agency</b> Washington, DC 20480	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide - Section I**

1. Company/Product Number 71653-2	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Genics Inc., CobraRod	PM# PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Genics Inc. c/o SRS International Corp. 7700 Leesburg Pike, Ste. 208 Falls Church, VA 22043 <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: <b>NOTIFICATION</b> EPA Reg. No. _____ DEC - 7 2005 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.)

See attached

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted	If "Yes" Unit Packaging wgt	No. per container	If "Yes" Package wgt	No. per container	Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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 Isaac Matthias	Title Agent for Genics Inc.	Telephone No. (Include Area Code) (703) 821 0157
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b>
2. Signature 	3. Title Agent for Genics Inc.	
4. Typed Name Isaac Matthias	5. Date 11/10/2005	

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NOTIFICATION  
DEC - 7 2005

**CobraRod, EPA Reg. No. 71653-2, Notification, Section II: Explanation**

Per PR Notice 98-10, this notification serves to:

1) Change the Boric Acid Equivalent (BAE) multiple value in the Directions for Use section of the label from 1.45 to 1.39. The composition of the product remains the same; the original figure of BAE 1.45 was incorrect, while the new figure of BAE 1.39 is correct.

2) Change the weight and BAE figures given in the table on the label titled "Cobra™ Rods BY SIZE AND BORIC ACID EQUIVALENT". The changes to the table are as follows:

Dimensions Size Imperial	Old Weight (oz.)	New Weight (oz.)	Old BAE (oz.)	New BAE (oz.)
1/4" x 1/2"	0.018	0.031	0.027	0.043
1/3" x 1/2"	0.046	0.055	0.067	0.077
1/3" x 1"	0.092	0.111	0.134	0.154
1/3" x 2 5/8"	0.212	0.291	0.308	0.405
1/2" x 2"	0.397	0.499	0.576	0.694
1/2" x 4"	0.785	0.749	1.14	1.041
3/4" x 3"	1.29	1.764	1.88	2.451
25/64" x 4 1/2"	0.596	0.705	0.864	0.981

**Certification Statement:**

These notifications are consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes, other than those described in this submission, 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 these notifications are not consistent with the terms of PR Notice 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.

## DIRECTIONS FOR USE

**Cobra™ Rods** are for remedial treatment of utility pole structures dimensional lumber (round stock, square stock) or any non-food contact piece of wood. **Cobra™ Rods** are recommended for protection against fungal decay and insects. **Cobra™ Rods** can be used for all wood species.

**Cobra™ Rods** are effective against some kinds of termites. **Cobra™ Rods** are used internally in wood with a permanent or periodical moisture content above the fibre saturation point (30%) for Poles, etc. The rate of application for **Cobra™ Rods** is dependent upon the volume of wood to be treated. The recommended load is up to 6 oz. Boric Acid per cubic foot of wood depending upon requirements for treatment. The loading should not be less than 2.0 oz. of Boric Acid per cubic foot of wood. **Cobra™ Rods** contain 1.39 times equivalent Boric Acid (BAE).

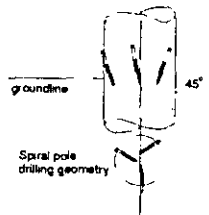
To install **Cobra™ Rods**, the three step process is as follows

1. Drill holes to accommodate the rod size needed
2. Insert the correct size and quantity of **Cobra™ Rods** needed into the pre-drilled holes (determined from area to be treated) Leave enough headroom to accommodate a 1/16" oversize plug Never hammer the **Cobra™ Rods** during installation

Inspections can be carried out every 5-8 years for industrial wood and every 8-10 years for commercial wood. If reuseable plugs are used new rods may be inserted into existing holes during the reinspection process and the same plugs tapped back into place.

The angle at which the rods are installed should be at 45° for commercial wood and 60-80° for industrial (large round stock) wood using a drill guide at the groundline zone. This will ensure the rods are placed in the most advantageous location for best diffusion results. The sapwood and heartwood interface in the outer shell is the best area, ensuring chemical loads are sufficient to provide adequate decay protection. If the wood is decayed sufficiently to be condemned and no reinforcement is mandated, DO NOT install **Cobra™ Rods**. Be careful during installation to not cause unacceptable structural damage to the wood during installation of rods.

PILLARTREAT DRILLING PATTERN



**Cobra™ Rods** are placed into holes drilled in wood at specific locations and depend upon moisture to work. The rods are positioned so that moisture distributes the desired loadings throughout the target area. For remedial treatments of existing decay, 6 oz. of Boric Acid Equivalent (BAE) per cubic foot of wood is recommended. For preventive treatments, 2 oz. BAE/cf is sufficient

# GENICS INC.

## Cobra™ Rod

Wood Preservative for Remedial Treatment of Utility Poles, Posts, Pilings, Millwork, Decks, Window Joinery and any non-food contact piece of wood.

Protection of Wood Against Fungal Decay and insects

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If in Eyes: Flush with plenty of water and call a poison control center or doctor for treatment advice.

If on skin: Wash with plenty of water and soap. Call poison control center or doctor for treatment advice.

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

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.

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

CONTAINS INGREDIENTS LISTED BELOW FUSED AT HIGH TEMPERATURE TO FORM A WATER SOLUBLE, CLEAR, HARD AND GLASS-LIKE ROD. COMPARED TO THE CRYSTALLINE INGREDIENTS, THE GLASS RODS FUNCTION AS A SLOW RELEASE SYSTEM. **Cobra™ Rods** ARE MANUFACTURED IN DIFFERENT SIZES AND WEIGHTS INCLUDING SMALL WAFERS AND PELLETS.

### ACTIVE INGREDIENTS:

Disodium Octaborate Tetrahydrate.....	90.6%
Boric Acid.....	4.7%
Cupric Hydroxide.....	2.9%
(As Copper Metal.....)	(2.6%)

INERT INGREDIENTS:.....	1.8%
TOTAL.....	100.0%

US EPA Reg. No. 71653-2 US EPA Est. No. 71653-CAN-01

Genics Inc.  
561 Acheson Rd. - 53016 Hwy 60  
Acheson, Alberta T7X 5A7  
(780) 962-1000 FAX: (780) 962-1052

Net Contents	500 rods	Number /Pkg	2 x 250 rods
Total weight	8.45 kg		

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

READ THE ENTIRE LABEL BEFORE USE.

**Cobra™ Rods** BY SIZE AND BORIC ACID EQUIVALENT

Dimensions Size Imperial	Weight Ounces	BAE Ounces
1/2" x 1/2"	.031 oz.	.043 oz.
1/3" x 1/2"	.055 oz.	.077 oz.
1/3" x 1"	.111 oz.	.154 oz.
1/3" x 2 5/8"	.291 oz.	.405 oz.
1/2" x 2"	.499 oz.	.694 oz.
1/2" x 4"	.749 oz.	1.041 oz.
3/4" x 3"	1.764 oz.	2.451 oz.
25/64" x 4 1/2"	.705 oz.	.981 oz.

Wafers 3/4" x 1/16"  
Pellets 1/4" x 1/4"

### Precautionary Statements

Harmful if swallowed. Avoid contact with eyes and skin. Wear gloves when handling **Cobra™ Rods**. Avoid rubbing eyes while working with product. Avoid breathing dust; use only in well ventilated area. Avoid dust formation. Do not break, crush, grind, mill, or powder this product. Wear freshly laundered clothes daily. Store and wash all protective clothing separately from household laundry. Wash clothing in detergent and hot water before reuse. Wash hands thoroughly after handling this product and before eating or smoking.

### Storage and Disposal

Store out of reach of CHILDREN

Do not contaminate water, food or feed by storage or disposal. Storage: Store in a dry location at all times, out of the reach of children and out of contact with food and feed. Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Packaging Disposal: Dispose of empty packaging in a sanitary landfill through ordinary trash collection, by incineration or if allowed by state and local authorities by burning. If burned, stay out of smoke.

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# SRS INTERNATIONAL CORPORATION

7700 Leesburg Pike • Suite 208 • Falls Church, VA 22043

Telephone (703) 821-0157 • Fax (703) 821-2299

E-Mail: [mainsrs@srsinternational.com](mailto:mainsrs@srsinternational.com) <http://www.srsinternational.com>

Via Courier

Tel: (703) 308 6411

November 10, 2005

Richard Gebken, PM 10  
Office of Pesticide Programs  
Crystal Mall #2  
1801 South Bell Street  
Arlington, VA 22202

Re: Notification in support of label revision  
Genics Inc., Company No.: 71653  
Product Registration No.: 71653-2

Dear Mr. Gebken,

On behalf of our client, Genics Inc., we are submitting the following attached items:

- EPA Form 8570-1 (Notification)
- Continuation of Explanation from Section II of notification form
- One (1) copy of revised labeling with changes clearly marked
- Stamped, self-addressed envelope identifying notification and registration no. (71653-2) to be returned by the Agency with decision on acceptability of notification

If you have any questions regarding this submission, please contact me at (703) 821 3255, (703) 821 0157 for voicemail, or at [imatthias@srsinternational.com](mailto:imatthias@srsinternational.com) for e-mail. Please address all correspondence relating to this notification to me at the address below.

Sincerely,

Isaac Matthias  
SRS International Corporation  
Agent for Genics Inc  
7700 Leesburg Pike, Suite 208  
Falls Church, VA 22043