

# OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

June 18, 2024

John A. Todhunter, Ph.D.
Registration Agent for Genics Inc.
SRS International
600 2<sup>nd</sup> Street, Unit 402
Alexandria, VA 22314

Subject: Notification per PRN 98-10 – Update Company Address, Logo and Net Contents

Product Name: Cobra™ Rod

EPA Registration Number: 71653-2 Application Date: June 6, 2024

Case Number: 614016

# Dear John A. Todhunter:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) 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 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 (FIFRA) 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 Compliance.

If you have any questions, please contact David Gardner at 202-566-2677 or at <a href="mailto:gardner.david@epa.gov">gardner.david@epa.gov</a>.

Sincerely,

Tamica Cain, Product Manager 10 Invertebrate & Vertebrate Branch 2 Registration Division (7505T)

James Cau

#### **DIRECTIONS FOR USE**

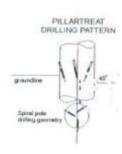
**Cobra™ Rods** are for remedial treatment of utility pole structures, dimensional lumber (round stock, square stock) or any nonfood contact piece of wood. **Cobra™ Rods** are recommended for protection against fungal decay and insects. **Cobra™ Rods** can be used for all wood species.

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 Boric Acid per cubic foot of wood. Cobra™ Rods contain 1.39 times equivalent Boric Acid (BAE).

To install *Cobra<sup>TM</sup> 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. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Inspections can be carried out every 5-8 years for industrial wood and every 8-10 years for commercial wood. If reusable plugs are used new rods may be inserted into the existing holes during the reinspection process and the same plugs tapped back into place. The angle at which the rods are installed should be  $45^{\circ}$  for commercial wood and  $60\text{-}80^{\circ}$  for industrial (large round stock) wood using a drill guide as the groundline zone. This will ensure the rods as 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.



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 preventative treatments, 2 BAE/cf is sufficient.

## NOTIFICATION

#### 71653-2

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:

06/18/2024



# 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 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. You may also contact 1-800-424-9300 for emergency medical treatment information.

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call poison control center or doctor for treatment advice.

If Inhaled: Move 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 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. Call a poison control center or doctor immediately for treatment advice.

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

CONTAINS INGREDIENTS LISTED BELOW FUSED AT HIGH TEMPERATURE TO FORM 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 SOZES AND WEIGHTS INCLUDING SMALL WAFERS AND PELLETS.

#### ACTIVE INGREDIENTS:

Disodium Octaborate Tetrahydrate	90.6%
Boric Acid	
Cupric Hydroxide (CAS 20427-59-2)	
INERT INGREDIENTS	

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

**Genics** 

27717 Acheson Road, Alberta T7X 6B1 (780) 962-1000 fax: (780) 962-1052

Net Contents Total Weight 500 rods 8.45 kg Number / Pkg (18.6 LBD) 2 x 250 rods

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
1/4 X 1/2 "	0.031 oz.	0.043 oz.
1/3 x ½"	0.055 oz	0.077 oz
1/3 x 1"	0.111 oz	0.154 oz
1/3 x 2 5/8"	0.291 oz	0.405 oz
½ x 2"	0.499 oz	0.694 oz
½ x 4"	0.749 oz	1.041 oz
<sup>3</sup> / <sub>4</sub> x 3"	1.764 oz	2.451 oz
25/64 x 4 ½"	0.705 oz	0.981 oz

#### **Precautionary Statements**

Hazards to Humans and Domestic Animals: Harmful if swallowed. Avoid contact with eyes and skin. Wear gloves when handling Cobra<sup>TM</sup>Rods. Avoid rubbing eyes while working with product. Avoid breathing dust, use only in well ventilated area.

Personal Protective Equipment (PPE): Applicators and other handlers must wear: Long-sleeved shirt and long pants, shoes and socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have become drenched or heavily contaminated with this product's concentrate. Do not reuse them.

### **User Safety Recommendations**

Follow manufacturer's instructions for cleaning/ maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have become drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

#### Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal. **Storage:** Store in a dry location at all times, out of reach of children and out of contact with food or feed.

**Disposal:** Excess rods may be disposed on site or at an approved waste disposal facility.

**Container Disposal:** Non-refillable container, Do not re-fill or re-use. If empty, offer for recycling if available or dispose of 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. If partly filled, dispose of on-site or call 1-800-CLEANUP or local authorities for disposal instructions.