

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 27, 2004

James A. Brient
Chemical Products Technology Manager
Merichem Chemicals & Refinery Services LLC
5455 Old Spanish Trail
Houston, TX 77023

Subject: CuNap-8 Wood Preservative
EPA Registration No. 71992-1
Application Dates: June 9, 2004
EPA Received Dates: June 14, 2004

Dear Mr. Brient:

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

Proposed Amendment

- Revised labeling

Label Comments

Revise the label as follows:

1. Delete "CuNap-8 (Copper Naphthenate)" from the First Aid heading.

CONCURRENCES

| | | | | | | | | |
|---------|---------|--|--|--|--|--|--|--|
| SYMBOL | 7510c | | | | | | | |
| SURNAME | X. Jay | | | | | | | |
| DATE | 7-27-04 | | | | | | | |

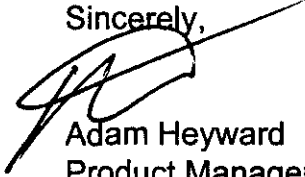
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General Comments

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

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)

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ACCEPTED
with COMMENTS
EPA Letter Dated:

JUL 27 2004

CuNap-8

WOOD PRESERVATIVE

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
amended for the pesticide,
registered under EPA Reg. No. 71992-1

ACTIVE INGREDIENT:
Copper naphthenate: 68%
(Copper, as Metal, 8%)

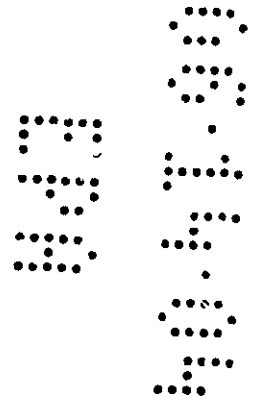
INERT INGREDIENTS: 32%

TOTAL: 100%

CONTAINS PETROLEUM DISTILLATES

See other precautionary statements on side panel.

KEEP OUT OF REACH OF CHILDREN
WARNING



| FIRST AID | |
|--|---|
| CuNap-8 (Copper Naphthenate) | |
| 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 and then continue rinsing eyes with water. • Call a poison control center or doctor immediately 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 treatment advice. |
| IF SWALLOWED | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person. • Do not induce vomiting unless told to do so by a poison control center or doctor. |
| IF INHALED | <ul style="list-style-type: none"> • Remove 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 immediately for treatment advice. |
| HOT LINE NUMBER | |
| CuNap-8 (Copper Naphthenate) | |
| Have the product container or label with you when calling a poison control center or doctor, or when going for treatment. In case of medical questions, emergencies, or accidents involving this product, call CHEMTREC at 1-800-424-9300. | |
| NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastral lavage. | |

EPA Reg. No. 71992-1
EPA Est. No. 71992-AL-001

Manufactured by
Merichem Chemicals & Refinery Services LLC
5455 Old Spanish Trail
Houston, TX 77023

6/9/2004

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Causes skin and eye irritation. Wear goggles, face shield, or safety glasses. Remove contaminated clothing and wash before reuse. Prolonged or repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin, or on clothing. Harmful if swallowed or inhaled. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling.

Do NOT breathe vapors or mist during brush, roll, spray, and dip applications. Wear a NIOSH/MSHA approved mist/vapor respirator when spraying for continued or prolonged use of this product or for frequent use of this product.

In case of medical questions, emergencies, or accidents involving this product, call Chemtrec at 1-800-424-9300. Application of this product may produce a strong, lingering, unpleasant odor.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic organisms. 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.

STORAGE AND DISPOSAL

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

STORAGE

Store at temperature between 0°F and 120°F. Store in original container only. Keep container closed when not in use.

PESTICIDE DISPOSAL

Pesticide concentrate, solution or rinsate that cannot be used or chemically reprocessed should be disposed of according to procedures approved by Federal, State or local authorities.

CONTAINER DISPOSAL

Plastic containers: Triple rinse (or equivalent). Then 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.

or

Metal containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

GENERAL

Consult federal, state or local disposal authorities for approved alternative procedures.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling
Use only the application method specified for a particular use. For Exterior Use Only.

CuNap-8 must be diluted before use with solvents such as mineral spirits, diesel fuel, mineral oil, etc., or solvents meeting AWPA Standard P-9* to protect treated items against deterioration by stain, mold and decay fungi, moss, mildew, termites, wood-boring beetles and carpenter ants.

CuNap-8 solutions may be applied to wood products such as lumber, posts, poles, ties, siding, boats, piers, docks, boxes, roof shakes and shingles, porches, steps, fence pickets and rails beverage cases; and for ornamental planting landscape timbers, wooden seedling trays, plant and flower boxes. Wood treated with CuNap-8 is NOT suitable for food garden uses. Effective application rates vary according to severity of conditions to which the treated product is exposed. Wood to be treated should be thoroughly seasoned and free of bark. Do not apply at sites on or near water or wetlands. Wood treated with CuNap-8 should not be used where it may come in contact with food, feed or potable water.

FOR TEXTILE TREATMENT

CuNap-8 solutions may be applied to cellulosic textiles and cordage products such as tents, awnings, tarpaulins, canvas products, ropes, and nets (except fishnets). However, CuNap-8 should not be used to treat textiles intended for uses resulting in repeated skin contact or contact with food or feed or potable water. Effective application results in 1% copper metal remaining in the treated product. The level of treatment is usually attained by dipping or soaking the product in a solution containing 2% copper metal made by mixing CuNap-8 with a solvent such as mineral spirits.

FOR TREATMENT BY SPRAYING, DIP, ROLLER, AND BRUSH

ABOVE GROUND CONTACT

For above ground exposure, brush, roller, spray or dip applications of solutions containing 1 or 2 percent copper metal are adequate for wood in non-critical applications. Dilute CuNap-8 with 3.0-3.8 volumes of solvent (depending upon density of diluent) to obtain 2% copper metal or 7.5-8.0 volumes of solvent (depending upon density of diluent) to obtain 1% copper metal.

COVERAGE: One gallon covers 100-300 sq. ft. depending upon the wood species, porosity of the wood, and method of application.

GROUND CONTACT

For wood intended for ground contact, treat according to AWWA Standards* with a solution containing 0.75 to 1.0 percent copper metal to a retention in the wood of 0.055 to 0.15 pounds copper metal per cubic foot.

FOR PRESSURE, VACUUM AND THERMAL TREATMENT

ABOVE GROUND CONTACT

For wood used above ground in critical (structural) applications or under more severe exposure conditions where it is subject to extended periods of wetting, extended soaking or pressure treatment in accordance with AWWA Standards' with a solution containing 0.5 to 1.0 percent copper metal to a retention in the wood of 0.04 to 0.06 pounds copper metal per cubic foot is recommended.

GROUND CONTACT

For wood intended for ground contact, treat according to AWWA Standards* with a solution containing 0.75 to 1.0 percent copper metal to a retention in the wood of 0.055 to 0.15 pounds copper metal per cubic foot.

FOR REMEDIAL TREATMENTS

CuNap-8 solutions of 2% copper metal may be used for external remedial treatment of standing wood poles, piling and other existing structures.

CuNap-8 may be used by formulators as an active ingredient source for ready-to-use pesticide products registered with the US Environmental Protection Agency. Products formulated or repackaged from this product must be labeled for "Exterior Use Only," and must bear all statements listed under the section entitled Precautionary Statements and the repackager(s) or formulator(s) telephone number.

*American Wood Preservers' Association