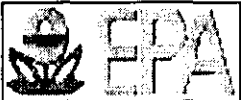



<p>U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Antimicrobials Division (7510C) 1200 Pennsylvania Avenue NW Washington, D.C. 20460</p>  <p>NOTICE OF PESTICIDE: <u> x </u> Registration <u> </u> Reregistration</p> <p>(under FIFRA, as amended)</p>	<p>EPA Reg. Number: 71992-4</p>	<p>Date of Issuance: May 12, 2005</p>
<p>Name and Address of Registrant (include ZIP Code):</p> <p>Merichem Chemicals & Refinery Services LLC 5455 Old Spanish Trail Houston, TX 77023-5013</p>	<p>Term of Issuance: Conditional</p>	
<p>Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</p>	<p>Name of Pesticide Product: Cu-Nap-2W</p>	
<p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.</p> <p>Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:</p> <ol style="list-style-type: none"> 1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4. 2. Make the labeling changes listed below before you release the product for shipment: <ol style="list-style-type: none"> a. Add the phrase "EPA Registration Number 71992-4". 		
<p>Signature of Approving Official:</p>  <p>Adam Heyward Product Manager Team-34 Regulatory Management Branch II Antimicrobials Division (7510C)</p>	<p>Date: May 12, 2005</p>	

3. Submit three (3) copies of the final printed label prior to releasing this product for sale.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,

A handwritten signature in black ink, appearing to be 'A Heyward', with a long horizontal line extending to the right.

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

Enclosure

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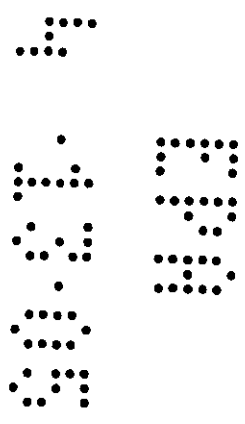
CuNap-2W

WOOD PRESERVATIVE

ACTIVE INGREDIENT:
 Copper naphthenate: 16.7 %
 (Copper, as Metal, 2%)

OTHER INGREDIENTS: 83.3 %

TOTAL: 100 %



See other precautionary statements on side panel.

KEEP OUT OF REACH OF CHILDREN
DANGER

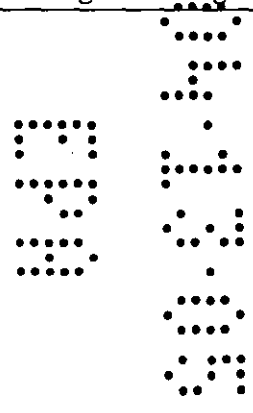
FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person. • Do not induce vomiting unless told to do so by a poison control center or doctor.
IF 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 IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse with a 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.
HOT LINE NUMBER	
CuNap-2W (Copper Naphthenate)	
Have the product container or label with you when calling a poison control center or doctor, or when going for treatment. You may also contact Chemtrec at 1-800-424-9300 for emergency medical treatment information, Monday through Friday, 8 a.m. to 4:30 p.m. (Central Time). After 4:30 p.m. call your poison control center.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

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

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAY 12 2005

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



Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 71992-11

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PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER

Causes irreversible temporary eye injury. Do not get in eyes or on skin or clothing. Wear goggles, or face shield,. Harmful if inhaled. Avoid breathing spray or mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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.

PESTICIDE STORAGE

Store at temperature between 0°F and 120°F. Store in a secure, well-ventilated area in original container only. Keep container closed when not in use.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. 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.

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.

ACCEPTED **GENERAL**
Consult Federal, State or local disposal authorities for approved alternative procedures.
EPA Letter Dated:

MAY 12 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended by the FIFRA pesticide, registered under EPA Reg. No. 91992-H

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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-2W 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 the statements listed under the section entitled Precautionary Statements and the formulator(s) or repackager(s) telephone number.

CuNap-2W is a ready to use product to protect treated items against deterioration by stain, mold and decay fungi, moss, mildew, termites, wood-boring beetles and carpenter ants. Use CuNap-2W to treat wood for use in moderate decay hazard locations, such as ground contact.

CuNap-2W solutions may be applied to wood products for all exterior wood exposed to moisture or weather such as lumber, posts, poles, piles, plywood, particle board, oriented strand board and other composite wood products, lumber, siding, millwork, boats, piers, docks, boxes, roof shakes and shingles, porches, steps, foundation sills, fence pickets and rails beverage cases; and for ornamental planting landscape timbers, wooden seedling trays, plant and flower boxes. Since CuNap-2W has very low phytotoxicity it can be used to treat wood for greenhouses, nursery flats, etc. Wood treated with CuNap-2W is NOT suitable for food garden uses. Effective application rates vary according to severity of conditions to which the treated product is exposed. Pretreatment only. Do not apply at sites on or near water or wetlands.

In addition to preventing decay, blue stain, and insect attack on wood, CuNap-2W controls warping, swelling, shrinking and end checking caused by changes in moisture content of lumber and plywood products.

Wood to be protected against subterranean termites should be treated before used in construction. Termites will not attack wood treated with CuNap-2W Wood Preservative.

Wood treated with CuNap-2W should not be used where it may come in contact with food, feed or potable water.

FOR TEXTILE TREATMENT

CuNap-2W solutions may be applied to cellulosic textiles and cordage products such as tents, awnings, tarpaulins, canvas products, ropes, and nets (except fishnets). However, CuNap-2W 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 percent 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 percent copper metal.

FOR TREATMENT BY SPRAYING, DIP, ROLLER, AND BRUSH

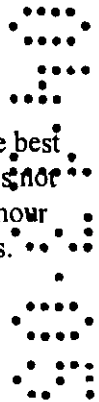
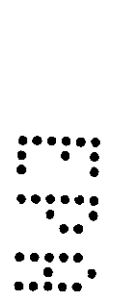
ABOVE GROUND CONTACT

For above ground exposure, brush, roller, spray or dip applications can be employed. The best results are obtained if wood to be treated is immersed for 3 minutes or longer. If dipping is not possible, 2 brush coats, roller or spray applications should be applied. Allow at least one hour between applications. Make certain all areas are fully treated to get the maximum benefits. Allow 24 hours or longer after application of the preservative prior to painting.

MAY 12 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is registered with the EPA. EPA Letter Dated: 1/19/92

71992-4



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GROUND CONTACT

Seasoned or green wood may be treated. Make certain the wood to be treated is free of bark, then immerse in diluted CuNap-2W solution for 12 to 48 hours or until the sapwood is completely penetrated.

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

Water repellants may be admixed with CuNap-2W to improve dimensional stability of the treated wood. Colorants may be admixed for aesthetics and additional UV protection. This product is compatible and may be colored by the universal machine colorants employed to color oil or water-based paints. Note that colorants weather differently, and that color development varies with species, grain and wood undertone.

FOR COMPOSITE WOOD PRODUCTS

CuNap-2W may be employed as a preservative for particleboard, plywood, oriented strand board, insulation board, and other wood fiber and particle-based composite panel materials. In this use, CuNap-2W is either applied to the wood furnish or mixed with resin or binding agent at 1-3 percent based on dry weight of wood.

FOR PRESSURE TREATMENT

ABOVE GROUND CONTACT

For wood used above ground in critical (structural) applications or under more severe exposure conditions where it is subjected to extended periods of wetting, extended soaking or pressure treatment in accordance with AWPAs Standards* with a solution containing 0.25 to 1.0 percent copper metal to a retention in the wood of 0.08 to 2.0 pounds copper metal per cubic foot is recommended.

GROUND CONTACT

For wood intended for ground contact, treat according to AWPAs Standards* with a solution containing 0.25 to 1.0 percent copper metal to a retention in the wood of 0.08 to 0.20 pounds copper metal per cubic foot.

FOR REMEDIAL TREATMENTS

CuNap-2W may be used for external remedial treatment of standing wood poles, piling and other existing structures.

*American Wood Preservers' Association

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

MAY 12 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No. 71992-4

