

75269-4

9/21/2010

10/6/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg. Number: 75269-4	Date of Issuance: SEP 21 2010
Term of Issuance: Unconditional	
Name of Pesticide Product: IMPRALIT TWN	

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):
 Rutgers Organics GmbH
 Oppauer Strasse 43
 D-68305 Mannheim Germany

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.

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.

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.

This product (OPP Decision No. D-432882) is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

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 re-registration of your product under FIFRA section 4.
2. Make the labeling changes listed below before you release the product for shipment:
 - a. Revise the "EPA Registration Symbol to read, "EPA Reg. No. 75269-4".

Signature of Approving Official:

 Jacqueline McFarlane, Product Manager (Team 34)
 Regulatory Management Branch II
 Antimicrobials Division (7510P)

Date:
SEP 21 2010

CONCURRENCES

SYMBOL	SURNAME	DATE

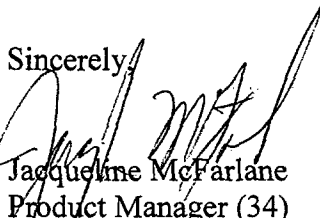
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- b. Reorganize the "First Aid" statements such that the statements are organized with the most severe route of exposure, as demonstrated by toxicity classification, are listed first. Therefore, the "First Aid" statements must be listed in the following order: If in Eyes; If Swallowed, If Inhaled, then If on Skin or Clothing."
- c. According to the December 22, 2008 acute toxicology data evaluation on the product cited as substantially similar, EPA Reg. No 3008-102, revise the "Precautionary Statements" to read "*Causes moderate eye irritation*. Harmful if swallowed or if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist or vapor."

3. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

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. Should you have any questions regarding this letter, please contact me at (703) 308-6416 or by email at Campbell-mcfarlane.jacqueline@epa.gov or Killian Swift at (703) 308-6346 or swift.killian@epa.gov.

Sincerely,

 Jacqueline McFarlane
 Product Manager (34)
 Regulatory Management Branch
 Antimicrobials Division (7510P)

Enclosure: Stamped Label
Chemistry Data Evaluation

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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Impralit TWN

A wood preservative for vacuum-pressure treatment of wood to permanently protect against insects, rot and fungal decay.

For commercial use

ACTIVE INGREDIENT:

Copper ethanalamine complex (CAS # 14215-52-2)* 30.12%

OTHER INGREDIENTS: 69.88%

TOTAL..... 100.00%

*(METALLIC COPPER EQUIVALENT – 10.31%)

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

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 for 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 treatment advice.

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.
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.

HOT LINE NUMBER

For emergency information call 980-253-8880

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

Net Contents: See waybill; shipped in bulk

RÜTGERS Organics GmbH
Oppauer Strasse 43
D-68305 Mannheim Germany

EPA REG. NO. 75269-XX

ACCEPTED
with COMMENTS
EPA Letter Dated:

EPA EST. NO. 75269-DEU-001

SEP 2 1 2010

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

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist or vapor.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers working with or around concentrate or wood treatment solutions must wear:

- Coveralls worn over long-sleeved shirt and long pants
- Socks and chemical-resistant foot wear
- Protective eyewear
- Chemical resistant gloves (such as barrier laminate, butylnitrile/neoprene rubber ≥ 14 mils, PVC ≥ 14 mils, and viton ≥ 14 mils). Clean or replace PPE at the end of each day's work period. Rinse off pesticides at rest breaks. For other options, use natural rubber ≥14 mils and polyethylene materials, but clean or replace PPE within an hour or two of contact.
- For mixing/loading: Wear a chemical resistant apron.
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

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

Applicators and other handlers must wear chemical resistant gloves when handling concentrated chemicals. Wear chemical resistant gloves where dermal contact is expected, such as handling freshly treated wood and manually opening cylinders doors. When entering pressure treatment cylinders or related equipment that is contaminated with treatment solution, wear protective clothing, including chemical resistant overalls, gloves and boots. For overhead exposure wear chemical resistant headgear.

Remove contaminated clothing and wash clothing before reuse. Promptly wash hands and skin with soap and water after handling. Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and work shoes or boots and equipment at the plant. Worn-out protective clothing and work shoes or boots must be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with the state and federal regulations.

USER SAFETY REQUIREMENTS

Applicators must not eat, drink or use tobacco products during those parts of application process that expose them to the wood treatment formulation (e.g. manually opening/closing cylinder doors, moving trams out of cylinders, mixing chemicals and handling freshly treated wood).

Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

CHEMICAL HAZARDS

This product, and its diluted solutions, are not compatible with non-ferrous heavy metals such as zinc, brass and galvanized equipment. Cement troughs must be protected with a suitable coating. This product is not compatible with certain commercial wood preservative salts. Please ask for technical advice before mixing with other products. Concentrate becomes very viscous at low temperatures and will freeze at or below 23°F (-5°C).

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ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates and may contaminate water through runoff. Do not contaminate water when disposing of equipment washwaters or rinsate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public 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.

DIRECTIONS FOR USE

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

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. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Use Impralit TWN to control all types of fungal decay of wood products – brown white, and soft rot – and wood-eating insects including termites. Use Impralit TWN to treat wood products that will be exposed to conditions favorable to rot, decay, or insect attack both above ground and in ground, or in water. Types of products include lumber, timbers, landscape ties, fence posts, building and utility poles, land, freshwater and marine piling, sea walls, decking, and wood shingles.

Tank mix Impralit TWN with compatible wood preservative products registered by the EPA for use as wood preservatives. Apply the tank mixed solution to wood by vacuum-pressure impregnation. The concentration of the tank mix used to treat wood must be based on the retention, in pounds per cubic foot (pcf), specified by the purchaser and the treating process used. Diluted treatment solutions may be reused. Replenish solution levels as necessary using fresh treatment solution of the same concentration. A 3% solution can be used to field coat the cut ends of pressure-treated wood by brush-on application.

MIXING INSTRUCTIONS

When Impralit TWN is used as a stand-alone preservative or in combination with other preservatives, it is diluted to a total active ingredient concentration of 0.4 to 4.0% by weight, depending on the wood species and the desired preservative retention in the treated wood. Examples of suitable wood preservatives that can be tank mixed with Impralit TWN include "Polymeric Betaine EP" (EPA Reg. No. 75269-3) and "Carboquat WP-50" (EPA Reg. No. 6836-304).

POLYMERIC BETAINE EP EXAMPLE: When this product is tank mixed with Impralit TWN, the ratio of polymeric betaine to copper (as copper oxide) should be maintained at 1:2.1 by weight. See the following mixing table for details.

Mixing Table for Tank Mix Impralit TWN and Polymeric Betaine EP

Solution Strength % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Solution Combine Following Gallons of		
	CuO	Betaine	Impralit TWN	Polymeric Betaine EP	Water
0.40%	0.271%	0.129%	16.4	2.2	981.4
0.60%	0.406%	0.194%	24.7	3.3	972.0
0.80%	0.542%	0.258%	33.0	4.4	962.6
1.00%	0.677%	0.323%	41.3	5.5	953.2
1.50%	1.016%	0.484%	62.4	8.3	929.3
2.00%	1.355%	0.645%	83.7	11.1	905.2
2.50%	1.694%	0.806%	105.2	13.9	880.9
3.00%	2.032%	0.968%	127.0	16.8	856.2
3.50%	2.371%	1.129%	149.1	19.7	831.2
4.00%	2.710%	1.290%	171.4	22.7	805.9

CARBOQUAT WP-50 EXAMPLE: When this product is tank mixed with Carboquat WP-50, the ratio of
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quaternary amines (DDAC) to copper (as copper oxide) should be maintained at 1:2 by weight. See the following mixing table for details.

Mixing Table for Tank Mix Impralit TWN and Carboquat WP-50

Solution Strength % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Solution Combine Following Gallons of		
	CuO	DDAC	Impralit TWN	Carboquat WP-50	Water
0.40%	0.267%	0.133%	16.2	2.8	981.1
0.60%	0.400%	0.200%	24.3	4.2	971.5
0.80%	0.533%	0.267%	32.5	5.6	961.9
1.00%	0.667%	0.333%	40.7	7.0	952.3
1.50%	1.000%	0.500%	61.3	10.5	928.2
2.00%	1.333%	0.667%	82.3	14.1	903.6
2.50%	1.667%	0.833%	103.4	17.8	878.8
3.00%	2.000%	1.000%	124.8	21.4	853.8
3.50%	2.333%	1.167%	146.5	25.1	828.4
4.00%	2.667%	1.333%	168.4	28.9	802.7

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Keep from freezing (above 40°F) in a tightly closed container. Store in a cool dry area.
PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact you State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.
CONTAINER DISPOSAL: Refill mini-bulk containers with pesticide only. Do not reuse these containers for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container for final disposal, empty the remaining contents from the container into the mix tank. Fill the container about 10 percent full with water. Recirculate water with the pump for two minutes. Then add the rinsate to a rinsate collection system or to the mix tank as diluent. Repeat this rinsing procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. The same procedure may be used to clean mini-bulk and bulk transport containers prior to refilling.

WARRANTY STATEMENT

RÜTGERS Organics GmbH warrants that this product complies with the specifications expressed on the label. To the extent consistent with applicable law, RÜTGERS Organics GmbH makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose.