

AUG 20 2008

Mr. Douglas Hocking  
International Pest & Vegetative Management  
A Division of Turf Science Laboratories, Inc.  
970 Park Center Drive, Suite C  
Vista, CA 92081

Subject: Label Amendment  
Envirotech WP  
EPA Registration Number: 75801-7  
Application Dated: May 21, 2008  
Decision No: 829725

Dear Mr. Hocking:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- Consistent with the pesticide container and containment Regulations (see 40 CFR 156.140), replace the entire "Container Disposal:...." Paragraph under Storage and Disposal" with the following language:  
Container Disposal: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available 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."

Add the following language to the General information Section of the product label:

- [Envirotech WP] is not intended as a substitute for mechanical alteration, soil treatment or foundation treatment. [Envirotech WP] is not intended for application to soil. In areas where a soil treatment/barrier termiticide treatment is required, [Envirotech] may be applied as a supplemental pretreatment to protect wood from subterranean termites that may penetrate chemical gaps occurring in termiticide-treated soil. [Envirotech WP] is not a soil termiticide. Do not use to treat soil directly. When active infestations exists, get a professional inspection.

Sincerely,



Kimberly Nesci  
Product Manager 11  
Insecticide Branch  
Registration Division (7505P)

Enclosure: Stamped Copy of Label "With Comments"

# ENVIROTECH™ WP

A Preservative for Protection and Treatment of  
Wood and Wood-Foam Composite Structural  
Components Against Decay Fungi and  
Wood-Destroying Insects

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

AUG 20 2008

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

75801-7

KEEP OUT OF REACH OF CHILDREN

## CAUTION

FIRST AID	
<b>If Swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor for immediate treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a Poison control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
HOT LINE NUMBER	
<p><b>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency: for additional information call (208) 265 5911.</b></p>	

4/9

SEE OTHER PANELS FOR PRECAUTIONARY STATEMENTS

Active Ingredient:

Disodium Octaborate Tetrahydrate\* 98.0%

Inert Ingredients..... 2.0%

Total..... 100.0%

\*CAS No 12280-03-4

EPA Reg. No. 75801-7

EPA Est. No. 75801-CA-001

Read and understand the label before using **ENVIROTECH™ WP**. Before buying or using **ENVIROTECH™ WP**, read the Warranty and Disclaimer statements found on the last page of the label.

Manufactured by:  
INTERNATIONAL PEST AND VEGETATION MANAGEMENT  
A Division of Turf Science Laboratories, Inc.  
970 Park Center Drive, Suite C  
Vista, Ca 92081

**Net Contents: 25 lb**

5/9

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION:

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with, eyes or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of food and feed. Do not leave container where children or animals may gain access.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Personal protective clothing, normal work clothes (i.e., long pants, shoes plus socks, a long sleeved shirt) plus waterproof gloves for all handlers, and a NIOSH/MSHA certified respirator during mixing and loading.

### ENVIRONMENTAL HAZARDS

“This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge System (NPDES) permit and 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.”

**NOTICE:** Because of many varying conditions affecting use and application, manufacturer warns buyer that these may impair or vary the results or effects of the use of this product. In any event, complete prevention of decay by fungi or other organisms is not guaranteed. Neither manufacturer or seller shall be liable in respect to any injury or damage suffered by reason of the use of this product for a purpose not indicated by the label or when used contrary to the directions or instructions hereon nor with respect to breach of any warranty not expressly specified herein. Buyer accepts this material subject to these terms, assumes all risk of usage and handling except when used or handled in accordance with this label. Neither manufacturer nor seller, makes, and their employees and agents are not permitted to make, any representations or warranties, express or implied by law, not specifically set forth herein.

### DIRECTIONS FOR USE

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

## GENERAL INFORMATION

**ENVIROTECH™ WP** is a water soluble inorganic borate salt for the protection and treatment of lumber and wood-foam composite structural components against decay fungi and wood boring beetles including Powder Post Beetles (*Lyctidae*), "False" Powder Post Beetles (*Bostrichidae*), Furniture Beetles and Old House Borers (*Anobiidae*), Longhorn Beetles (*Cerambycidae*) and Bark and Timber Beetles (*Scolytidae*). This treatment is not effective against wood staining fungi and may require mixing with compatible products.

**ENVIROTECH™ WP** also controls Subterranean Termites (*Reticulitermes*, *Coptotermes*, *Hetertermes*), Dampwood Termites (*Zootermopsis*), Drywood Termites (*Kaloterms*, *Incisitermes*), and Carpenter Ants, (*Camponotus*).

**ENVIROTECH™ WP** is recommended for all interior and exterior wood and wood-foam composite structural components which will be protected from rain and not in direct contact with soil. The treatment of lumber is permanent even after cutting and finishing providing the wood is not exposed to moisture or in contact with the soil. Ensure that wood to be treated is free of paint, stain or any other coating since these will markedly impair the efficacy of the product.

This product is toxic to wood destroying insects but surface etching of treated wood and wood-foam composite structural components may occur.

## MIXING INSTRUCTIONS

To prepare solutions (10% or 15% w/w) of **ENVIROTECH™ WP** in water first add approximately 80% of the required volume of water to a mixing vessel and slowly add, with stirring, the required quantity of **ENVIROTECH™ WP**. Once this is completely dissolved, add the remaining water to bring to the required volume. For a concentration of 10% use one pound of per gallon of water. Similarly, for a concentration of 15% use one and a half pounds of **ENVIROTECH™ WP** per gallon of water. When mixing a 15% foam formulation use the same technique for preparing the 15% solution and add a suitable foam aid according to the foam aid manufacturer's specification to produce a dry foam.

## REMEDIAL AND PREVENTATIVE TREATMENTS

Remedial treatment of infestations caused by the target pests identified above or the prevention of future infestations can be achieved by using dry powder, 10% or 15% aqueous solutions or a 15% foam application.

### **Powder Treatment:**

Dust dry powder liberally onto wood surfaces or inject wall voids, cavities or insect galleries with powder at the rate of 0.5 oz per square foot.

### **Solution Application:**

Apply 10% or 15% aqueous solutions of **ENVIROTECH™ WP** by either brush or low pressure sprayer until the wood surface is saturated to achieve both remedial and preventative treatments. Effective treatment can be achieved by one application of the 15% solution or two applications of the 10% solution separated by a 20 minute wait time. One gallon of solution will treat 200 square feet of wood surface area.

**Injection:**

Drill wall cavities and inject dry foam to completely coat all accessible surfaces. Drill insect galleries and inject dry foam or a solution of **ENVIROTECH™ WP** until excess material runs from entrance or exit holes.

**TREATMENT DURING CONSTRUCTION:** apply 10 – 25% solution to runoff on all accessible interior and exterior wood surfaces as a minimum treatment to the bottom 24" up from foundation or ground at rate of approx. 5 gallons per 1000 sq. ft. of wood surface area. Apply after framing and roofing are in place, before insulation and dry wall installed. May also treat whole house. Where one wood side is exposed, treat twice, allow to dry between treatments.

**CRAWLSPACES & BASEMENTS:** Treat all exposed and/or accessible wood.

**TREATMENT TO WOOD-FOAM COMPOSITE STRUCTURAL**

**COMPONENTS:** Apply 10% solution on all sides to runoff.

Note: a quart or 32 oz container loose packed equals one pound

**DIP-DIFFUSION TREATMENT: PREPARATION OF SOLUTIONS:** To prepare solutions, described below, water should be added to the tank to about 80% of the solution required. The temperature is then raised to the desired level and the calculated amount of **ENVIROTECH™ WP** is gradually added with good agitation. The remaining water is then added and the solution agitated for an additional 10 minutes to ensure that all of the product has dissolved. The temperature of the solution should be maintained during treatment. Upon cooling some borate may crystallize out of the solution, but will re-dissolve when the solution is heated for the next treatment session. In very cold weather, some heating or insulation should be provided to prevent solidification in the bottom of the tank. The tank should be covered when not in use to prevent contamination and evaporation of water.

**SUGGESTED CONDITIONS AND SOLUTION STRENGTHS  
FOR THE DIFFUSION METHOD**

<b>Lumber Thickness</b>	<b>Pounds of ENVIROTECH™ WP For 100 Gallons Solution</b>	<b>Diffusion Temp</b>	<b>Solution Complete in (weeks)</b>
Up to 1 inch (2.5cm)	140	105°F(40°C)	2 to 4
1 to 1.75 inches (2.5cm to 4.0cm)	180	120°F(50°C)	4 to 6
1.75 to 2.5 inches (4.0cm to 6.5cm)	250	130°F(55°C)	4 to 6
2.5 to 3 inches* (6.5cm to 7.5cm)	280	135°F(57°C)	6 to 8

\* Lumber over 3 inches (7.5cm) in thickness or over 5 inches (12.5cm) in width should be dipped twice 24 to 72 hours apart.

**DIP-DIFFUSION METHOD OF APPLICATION:** Dip freshly cut lumber in a tank containing a hot aqueous solution of **ENVIROTECH™ WP** for 2 to 5 minutes. After dipping, the newly treated wood should be stacked and stored under a tarpaulin or shed roof to slow the drying process and prevent wash off by rainfall, thus improving penetration. Diffusion of the wood preservative into the interior of the wood will start

immediately and will require several weeks to thoroughly penetrate the lumber, depending on species and thickness of wood. The dip-diffusion method of treatment can result in complete penetration throughout the whole cross-sectional area of treated lumber.

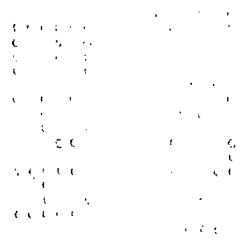
**PRESSURE TREATMENT:** Pressure treatment must rigidly adhere to the current specifications of **ENVIROTECH™ WP** and/or those of the American Wood Preserver's Association (AWPA).

**STORAGE AND DISPOSAL:** Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Store in a dry place. Do not store where children or animals may gain access.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.





LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read this Limitation of Warranty and Liability Before Buying or Using This Product. If the Terms Are Not Acceptable, Return the Product at Once, Unopened, and the Purchase Price Will Be Refunded.

It is impossible to eliminate all risks associated with the use of this product. Such risks arise from weather conditions, off-target movement, non-conforming application techniques, the presence of other materials, the manner of use or application, or other unknown factors beyond the control of Turf Science Laboratories, Inc. These risks can render the product ineffective or damage non-target surfaces.

Turf Science Laboratories, Inc does not agree to be an insurer of these risks beyond what is expressly warranted by this label. When you buy or use this product, you agree to accept these risks.

Turf Science Laboratories, Inc warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.

To the extent consistent with applicable law, Turf Science Laboratories, Inc makes no other express or implied warranty of fitness or of merchantability or any other express or implied warranty.

To the extent consistent with applicable law, in no event shall Turf Science Laboratories, Inc or its representative be liable for any incidental, consequential or special damages resulting from the use or handling of this product. Buyer's or user's bargained-for expectation is efficacy against termites, insects and fungi. To the extent consistent with applicable law, the exclusive remedy of the user or buyer and the exclusive liability of Turf Science Laboratories, Inc or the seller, for any and all claims, losses, injuries or damages (including claims based on breach of warranty or contract, negligence, tort or strict liability), whether from failure to perform or damage resulting from the use or handling of this product, shall be the return of the purchase price of the product, or at the election of Turf Science Laboratories, Inc or its representative, the replacement of the product.

To the extent consistent with applicable law, Turf Science Laboratories, Inc or its authorized representative must have prompt notice of any claim so that an immediate investigation of claim can be made. Buyer and all users shall promptly notify Turf Science Laboratories, Inc or its authorized representative of any claims, whether based on contract, negligence, strict liability, or other tort or otherwise be barred from any remedy.

This Limitation of Warranty and Liability may not be amended by any oral or written agreement.