

81819-1

04/21/2005

1/7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

April 21, 2005

Michael Kellogg  
Agent for CTA Products Group  
Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> Street, NW  
Gig Harbor, WA 98332

Subject: Q8 Log Oil  
EPA Registration Number 81819-1  
Application Date: March 28, 2005  
EPA Received Date: March 30, 2005

Dear Mr. Kellogg:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA 3(c)9.

**Proposed Notification**

- Revised labeling

**General Comments**

Based on a review of the materials submitted, the following comments apply:

The notification application is acceptable. A copy has been inserted in your file for future reference.

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)

**CONCURRENCES**

SYMBOL	7510c						
URNAME	Heyward						
DATE	4/21/05						

34

2/7

**PYXIS REGULATORY CONSULTING, INC.**

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

March 28, 2005

**COURIER DELIVERY**

Adam Heyward (PM34)  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1801 Bell Street  
Arlington, VA 22202-4501

RE: CTA Products Group – Q<sup>8</sup> Log Oil (81819-1)  
Submission of Label Notification per PR Notice 98-10

Dear Mr. Heyward:

On behalf of CTA Products Group please find the enclosed label notification adding alternate language to the Q<sup>8</sup> Log Oil front panel. Alternate language that may appear on the final product label appears below:

**Oil Based Wood Preservative**

- Excellent Long Term Water Repellency
- One Coat Coverage
- Stops Wood Rot and Decay
- Toxic to Termites and Powder-post Beetles
- Soap and Water Cleanup

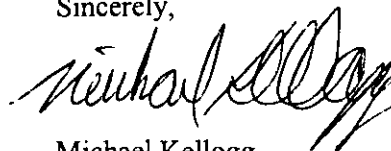
The company name "Infotrac" has also been added to the Hot Line number of the First Aid statements. [Please note: The Hot Line number has not been changed, only the company name "Infotrac" corresponding to the toll-free number has been added]

In support of this notification, we submit the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the Q<sup>8</sup> Log Oil label with changes tracked [Editors Note: Added text is underlined]
3. One (1) copy of the Q<sup>8</sup> Log Oil label with changes incorporated
4. Letter of Authorization

We trust you will find this notification complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: Gregg Overman; CTA Products Group



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 81819-1	2. EPA Product Manager A. Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CTA Products Group / Q8 Log Oil	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) CTA Products Group c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b) (i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of label notification per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7359
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) ..... ..... ..... ..... ..... ..... .....
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 3/28/05	

# Q<sup>8</sup> Log Oil

## Water Repellent Wood Preservative

[Note to reviewer: The following alternate language may appear on the Q<sup>8</sup> Log Oil final labeling]

### Oil Based Wood Preservative

- Excellent Long Term Water Repellency
- One Coat Coverage
- Stops Wood Rot and Decay
- Toxic to Termites and Powder-post Beetles
- Soap and Water Cleanup

**Semi-transparent color and DECAY CONTROL FOR: Log Homes \* Wood Roofs \* Siding \* Fences \* Rough Sawn Lumber \* Old Weathered Wood \* New Porous Wood**

This product exceeds NWWDA and Fed. Spec. TT-W-572 Water Repellency requirements by 400%.

#### ACTIVE INGREDIENT:

Copper 8-quinolinolate:..... 0.675%

**OTHER INGREDIENTS\*:** ..... 99.325%

**TOTAL:**..... 100.000%

\*Contains petroleum distillates.

Contains Metallic equivalent of Copper.

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
<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>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give <b>any</b> liquid to the person.</li> <li>• Do not give anything by mouth to an unconscious person.</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 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>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Infotrac 800-535-5053 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate – vomiting may cause aspiration pneumonia.	

See side panel for additional PRECAUTIONARY STATEMENTS

EPA Reg. No. 81819-1

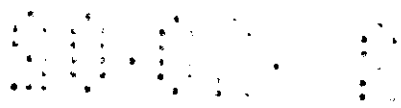
EPA Est. No.

Manufactured for:

CTA Products Group

6915 Crumpler Blvd., Suite B #130

Olive Branch, MS 38654



Net Contents:



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

Causes moderate eye irritation. Harmful if inhaled, swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

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.

---

**DIRECTIONS FOR USE**

---

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

**GENERAL INFORMATION**

Q<sup>8</sup> Log Oil is an oil based semi-transparent preservative designed for log homes, wood shingle roofs, siding and fences. Q<sup>8</sup> Log Oil is also effective on greenhouse items, fruit and vegetable boxes, and other farm uses and is especially effective on wood surfaces in close proximity with animals, feedstuffs and similar sites. Q<sup>8</sup> Log Oil's oil formula penetrates deep into wood providing long-term protection, achieving maximum performance on rough sawn lumber, old weathered wood and new porous wood where maximum penetration results in exceptional water repellency on sloping roofs and vertical surfaces. Q<sup>8</sup> Log Oil combines decay and mold control with unique and exceptional water repellency that withstands vertical weathering, particularly on old, cracked, weathered wood.

Q<sup>8</sup> Log Oil will never chip, crack or peel. When applied as directed, it leaves a uniform, streak-free appearance. Do not apply to non-porous or film-covered surfaces that prevent or significantly retard penetration. Remove previous coatings prior to application of Q<sup>8</sup> Log Oil.

In addition to protecting and extending service life by inhibiting decay and mold, Q<sup>8</sup> Log Oil is toxic to termites and powderpost beetles.

Make a single coat application every 2 to 4 years on vertical surfaces. Not recommended for walk surfaces of decks. Annual retreatment may be required to maintain water repellency for harsh exposures involving standing water, such as horizontal surfaces, window sills, etc. When making applications, always **apply to the point of refusal**. Double coat applications are not needed nor are recommended. Q<sup>8</sup> Log Oil may be cleaned up with water and detergent at the time of application, provided it has not soaked into the surface. Cured Q<sup>8</sup> Log Oil will clean up with paint thinner or mineral spirits. Q<sup>8</sup> Log Oil temporarily darkens the wood color and lightens to the selected semi-transparent color tone selected as it cures. Exact color is dependent upon the base color of the original wood.

**APPLICATION INSTRUCTIONS**

Surfaces to be treated should be bleached or acid cleaned and free of all loose debris. For maximum penetration and fastest drying, apply to dry wood. Q<sup>8</sup> Log Oil can be applied to damp wood, but expect reduced performance. Apply one coat of Q<sup>8</sup> Log Oil liberally to the surfaces to be treated by wetting down the surface as follows:

Spray – Using pump-up garden type spray equipment, set the sprayer nozzle to deliver a coarse, low pressure spray, and backbrush as needed.

Roller and Brush applications are suitable if applied to the point of refusal. Spray applications are preferred when possible.

**For Best Results:**

- Stir or shake well prior to use.
- Do not apply Q<sup>8</sup> Log Oil if rain is expected within 36 hours of application.
- Apply Q<sup>8</sup> Log Oil to the wood until the wood stops absorbing the product.
- Make applications of Q<sup>8</sup> Log Oil when temperatures are above 50°F; the warmer the weather, the faster the drying. Below 65°F, Q<sup>8</sup> Log Oil may become too viscous to spray, but can easily be applied by brush in temperatures down to 50°F.
- To assure expected results on smooth and / or dense wood, test on a small area before using.

**Things to Avoid:**

- Avoid contact of Q<sup>8</sup> Log Oil with asphalt as asphalt softening will occur.
- Avoid contact of Q<sup>8</sup> Log Oil with vegetation (such as grass, shrubs, or trees) or damage to the plants may occur.
- Do not use Q<sup>8</sup> Log Oil on painted or otherwise treated surfaces as Q<sup>8</sup> Log Oil must penetrate the surface to be effective.
- Avoid open flame during application and until Q<sup>8</sup> Log Oil has soaked in completely.
- Q<sup>8</sup> Log Oil protection will not withstand repeated contact with chlorine or chlorinated water. Avoid using Q<sup>8</sup> Log Oil on wood in contact with chlorine, or retreat as necessary.

**General Information:**

- One gallon of Q<sup>8</sup> Log Oil will cover approximately 150 to 300 sq. ft., depending on surface condition and wood porosity.
- The final appearance of wood finished with Q<sup>8</sup> Log Oil is considerably lighter than when first applied.
- Q<sup>8</sup> Log Oil is normally cured 2 weeks after application. Final cure time depends on temperature and wood porosity.
- Q<sup>8</sup> Log Oil provides an immediate water repellent barrier; however, its ability to bead water develops during the curing process.
- Until Q<sup>8</sup> Log Oil has thoroughly cured, treated surfaces may be slippery.

**Refinishing and Subsequent Painting:**

- Surfaces may be retreated when they show signs of losing water repellency.
- Q<sup>8</sup> Log Oil provides extraordinary strong properties of water repellency and as such, subsequent paint applications will not adhere as long as the Q<sup>8</sup> Log Oil barrier remains intact. If in doubt, test first.

### TINTING INSTRUCTIONS

Q<sup>8</sup> Log Oil is compatible with and may be colored by the addition of small quantities of the Universal Machine Colorants employed to color water or oil based paints. It is important to note that different colorants weather differently and that color development varies with wood species, wood grain and wood undertone.

Consult your Q<sup>8</sup> Log Oil dealer for assistance in tinting Q<sup>8</sup> Log Oil. Q<sup>8</sup> Log Oil is a transparent preservative oil finish that can be tinted to a light stain. Do not attempt to obtain a heavy or solid color stain by overloading with pigment.

When applying tinted Q<sup>8</sup> Log Oil, stir frequently to keep pigments evenly dispersed and uniform. Coat surfaces evenly. Smooth sags or runs by feathering with a brush or cloth in order to achieve a uniform appearance.

Pigmented Q<sup>8</sup> Log Oil is not recommended for decks, furniture or other contact surfaces because of its long drying characteristics.

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a secure, well-ventilated area protected from extreme temperatures. Do not transfer to unmarked containers. Keep container closed when not in use.

**DISPOSAL:**

**If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

**If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

### LIMITED WARRANTY AND DISCLAIMER

CTA Products Group warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions For Use. Buyer assumes all risks of use and handling not in strict accordance with the directions provided in this label. CTA Products Group makes no other express or implied warranty of fitness or merchantability. To the extent allowed by state law, neither CTA Products Group nor the seller shall be liable for damages resulting from the use or handling of this product not in accordance with the directions provided in this label. CTA Products Group and Seller offer this product and the Buyer and user accept it, subject to the foregoing Limited Warranty and Disclaimer which may be varied only by agreement in writing signed by a duly authorized representative of CTA Products Group.

