



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 3, 2008

Frederick T. Smith
SciReg, Inc. the Agent for
Preschem PTY. LTD
12733 Director's Loop
Woodbridge, VA 22192

Subject: Product Name: Bioguard Paste
 EPA Reg. Number: 83933-1
 Application Date: 03-Jul-2008
 EPA Receipt Date: 07-Jul-2008

Dear Mr. Smith:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the following conditions:

Proposed amendment:

- ~~Conditional registration follow-up: Submission of preliminary analysis [OPPTS Guidelines No. § 830.1700]; enforcement analytical method [OPPTS Guidelines No. § 830.1800]; and storage stability and corrosion characteristics [OPPTS Guidelines No. § 830.6317]~~
- Revised labeling

Labeling comments:

1. The signal word "**WARNING**" must be placed immediately below the "Keep Out of Reach of Children" statement.
2. The storage and disposal statement must be displayed as follows:

STORAGE AND DISPOSAL

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

Pesticide Storage: Do not store near open heat or flame

Pesticide Disposal: (you may use the current statement on label)

Container Disposal (you may use the current statement on label)

- 3. The establishment number must be listed on the label.


General comments:

For detailed information and consideration, please refer to the enclosed AD/PSB product chemistry review dated July 31, 2008.

Submit three (3) copies of the final printed labeling bear the above revisions. A stamped copy of the labeling is enclosed for your records. Note that the Agency is moving away from review of paper submitted registration applications to electronic review of applications. Therefore, we need your help to make this an efficient and convenient process for both you and the Antimicrobials Division. Accordingly, we are asking you to submit future labeling amendments for this product via the electronic labeling process. Refer to the following website for guidance on electronic submissions, including label: http://www.epa.gov/oppfead1/eds/esr_guidance.htm#overallsub. If you have questions concerning electronic labeling, a list of contacts is available at the following site: <http://www.epa.gov/oppfead1/eds/edsgoals.htm#contacts>.

If you have further questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at heyward.adam@epa.gov or Renae Whitaker by telephone at (703) 308-7003 or by email at whitaker.renae@epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,


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

Enclosure: A copy of the stamped label & PSB review



Preschem
SMARTER TIMBER PROTECTION

Bioguard Paste

FOR INDUSTRIAL USE ONLY.
NOT FOR HOUSEHOLD USE.

WARNING

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently 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 SWALLOWED	<ul style="list-style-type: none"> • 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 to an unconscious person.
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.

IN CASE OF EMERGENCY, CALL CHEMTREC AT 800-424-9300. Have the product container or label with you when calling a Poison Control Center or doctor for further treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Active Ingredients:

Boric Acid 40.8%
Sodium Fluoride* 22.5%

Other Ingredients: 36.7%
TOTAL: 100.0%

*Contains 20.4% available fluorine.

KEEP OUT OF REACH OF CHILDREN

See Side Panel for Additional Precautionary Statements

EPA Reg. No. 83933-1 EPA Est. No.

Preschem Pty. Ltd.
147-149 Herald St.
Cheltenham, 3192, Victoria
Australia
www.preschem.com

BATCH NO:

NET CONTENTS:

- 44 lbs 10 lbs 20.2 oz
 22 lbs 10.1 oz

ACCEPTED
with COMMENTS
in EPA Letter Dated:
SEP - 3 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 83933-1

Bioguard Paste

DESCRIPTION

Bioguard Paste has a total of 63.7% active ingredients for preservation of timber. The paste is a combination of boron and sodium fluoride which effectively diffuses through timber. Bioguard Paste can be used above or below ground in situations where timbers are susceptible to wood-decaying fungi.

Bioguard Paste is commonly used for groundline treatment of utility poles worldwide, and for other applications such as railroad ties, protection of posts, timber bridges and other timber structures that become susceptible to decay.

DIRECTIONS FOR USE

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

UTILITY POLES-External Application:

Bioguard Paste is applied with a brush or directly onto the timber after inspection. Apply to achieve a layer of no less than 1/16" thick to the required distance above and below ground line. Typical applications are from 18" to 24" below ground to 3" above groundline. Ensure paste is pushed into uneven surfaces on the pole such as cracks and checks. It is not uncommon to treat the complete below ground surface of poles where a pole has been exposed near a roadway or hillside. The paste is then covered with a water-proof bandage. If more than one bandage is required, overlap ends to insure complete coverage. Wrap bandage tightly, stapling or nailing to keep it in place. Back fill and tamp soil firmly, but do not fill above the bandage.

PRE-FORMED BANDAGE APPLICATION

Bioguard Paste can be pre-applied into bandages so as to provide a 1/16" thick layer of paste to the pole. These bandages can be pre-cut to the required length and width and must be made of a water-proof material.

TIMBER STRUCTURES-Internal Application

For control of internal decay Bioguard Paste can be applied into holes where protection is required. Using the smallest pack size and a grease/caulking gun application can be via a pressurised applicator. Following application it is important to cap holes with a plug.

RAIL ROAD TIES-External Application

Bioguard Paste is applied manually or with a simplified mechanical application machine. Typical applications include the application of the paste under the tie plate to achieve a layer no less than 1/16" in thickness. Ensure the paste penetrates uneven surfaces, checks and the predrilled holes of the spikes or screws which hold the tie plate in place. Minimizing the biological deterioration of wood around anchoring hardware ensures longevity for the tie, reduces loosening of the tie plate and resulting gauge widening of the rail.

OTHER WOODEN STRUCTURES

Apply to area requiring protection using a minimum thickness of 1/16" and always ensure a

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if swallowed or if absorbed through skin. Avoid contact with skin, eyes or clothing. Wear goggles or face shield. 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 pesticide is toxic to fish and wildlife. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

Do not contaminate water, food, or feed by storage or disposal. Do not store near open heat or flame.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

If product is in metal container, do not attempt to burn or incinerate. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.