UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDE
AND TOXIC SUBSTANCES

July 31, 2008

Wendy A. McCombie
Agent for Viance, LLC
Lewis & Harrison Consultants
122 C. Street, NW #740
Washington, DC 20001

Subject: **ACQ-C2**
EPA Registration Number: 83997-4
Application Dated: June 12, 2008
Receipt Date: June 16, 2008

Dear Ms. McCombie:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- Minor label revision (Update current tables for quat tank mixtures)

General Comment

Should you have further questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at heyward.adam@epamail.epa.gov or Lisa McKelvin by telephone at (703) 308-7496 or by email at mckelvin.lisa@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,

Lisa R. McKelvin

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

DIRECTIONS FOR USE

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

Use ACQ-C2 to control all types of fungal decay of wood products – brown, white and soft rot and wood eating insects including termites. ACQ-C2 should be used to treat any wood product that will be exposed to conditions favorable to rot, decay or insect attack both above ground and in ground or 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 ACQ-C2 with EPA registered wood preservative compounds approved for wood treatment. Apply the tank mixed solution by pressure impregnation. Use the example mixing instructions attached to this label to achieve the desired solution concentration. The percent solution to be used should be based on the retention, in lbs. per cubic foot (pcf), specified by the purchaser and by the treating process used.

A 3% solution can be used to field coat the cut ends of pressure treated wood by brush-on application.

ACCEPTED
JUL 31 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No 83997-4

ACQ-C2

For the Control of Wood Damaging Fungi and Insects

Active Ingredient:

Copper as elemental*	9.0%
Inert Ingredients	91.0%
Total	100.0%

*From mixed Copper ethanolamine complexes.

KEEP OUT OF REACH OF CHILDREN
DANGER

FIRST AID

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.
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 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 INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured For:
Viance, LLC.
200 East Woodlawn Road, Suite 350
Charlotte NC 28217
Email: productinfo@viance.net

In case of Emergency ph:
800-424-9300 (CHEMTREC)

EPA Reg. No. 83997-4
EPA Est. No. 10465-NC-1

Net Contents: _____

PRECAUTIONARY STATEMENTS
Hazards To Humans And Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if swallowed, absorbed through the skin or inhaled. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water 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 Environmental Protection Agency.

STORAGE & DISPOSAL

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

Pesticide Storage: Store in original container in a cool, dry place.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot 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.

Container Disposal: 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

Example Mixing Table for ACQ®-C2 and Q50-C to make ACQ Type A

Required Solution Strength (% active)	Component balance (actives basis)		To mix 1000 gal treating solution combine the following quantities of		
	CuO	Quat	ACQ-C2 (gal)	Q50-C, Q50 or Q50M (gal)	Water (gal)
0.40%	0.20%	0.20%	14.0	4.1	981.9
0.45%	0.23%	0.23%	15.7	4.7	979.6
0.50%	0.25%	0.25%	17.5	5.2	977.3
0.55%	0.28%	0.28%	19.2	5.7	975.1
0.60%	0.30%	0.30%	21.0	6.2	972.8
0.65%	0.33%	0.33%	22.7	6.7	970.6
0.70%	0.35%	0.35%	24.5	7.3	968.3
0.75%	0.38%	0.38%	26.2	7.8	966.0
0.80%	0.40%	0.40%	28.0	8.3	963.8
0.85%	0.43%	0.43%	29.7	8.8	961.5
0.90%	0.45%	0.45%	31.4	9.3	959.2
0.95%	0.48%	0.48%	33.2	9.8	957.0
1.00%	0.50%	0.50%	34.9	10.4	954.7
1.05%	0.53%	0.53%	36.7	10.9	952.4
1.10%	0.55%	0.55%	38.4	11.4	950.2
1.15%	0.58%	0.58%	40.2	11.9	947.9
1.20%	0.60%	0.60%	41.9	12.4	945.6
1.25%	0.63%	0.63%	43.7	13.0	943.4
1.30%	0.65%	0.65%	45.4	13.5	941.1
1.35%	0.68%	0.68%	47.2	14.0	938.8
1.40%	0.70%	0.70%	48.9	14.5	936.6
1.45%	0.73%	0.73%	50.7	15.0	934.3
1.50%	0.75%	0.75%	52.4	15.5	932.0
1.55%	0.78%	0.78%	54.2	16.1	929.8
1.60%	0.80%	0.80%	55.9	16.6	927.5
1.65%	0.83%	0.83%	57.7	17.1	925.2
1.70%	0.85%	0.85%	59.4	17.6	923.0
1.75%	0.88%	0.88%	61.2	18.1	920.7
1.80%	0.90%	0.90%	62.9	18.7	918.4
1.85%	0.93%	0.93%	64.7	19.2	916.2
1.90%	0.95%	0.95%	66.4	19.7	913.9
1.95%	0.98%	0.98%	68.1	20.2	911.6
2.00%	1.00%	1.00%	69.9	20.7	909.4
2.05%	1.03%	1.03%	71.6	21.3	907.1

Required Solution Strength (% active)	Component balance (actives basis)		To mix 1000 gal treating solution combine the following quantities of		
	CuO	Quat	ACQ-C2 (gal)	Q50-C, Q50 or Q50M (gal)	Water (gal)
2.10%	1.05%	1.05%	73.4	21.8	904.8
2.15%	1.08%	1.08%	75.1	22.3	902.6
2.20%	1.10%	1.10%	76.9	22.8	900.3
2.25%	1.13%	1.13%	78.6	23.3	898.0
2.30%	1.15%	1.15%	80.4	23.8	895.8
2.35%	1.18%	1.18%	82.1	24.4	893.5
2.40%	1.20%	1.20%	83.9	24.9	891.2
2.45%	1.23%	1.23%	85.6	25.4	889.0
2.50%	1.25%	1.25%	87.4	25.9	886.7
2.55%	1.28%	1.28%	89.1	26.4	884.4
2.60%	1.30%	1.30%	90.9	27.0	882.2
2.65%	1.33%	1.33%	92.6	27.5	879.9
2.70%	1.35%	1.35%	94.4	28.0	877.6
2.75%	1.38%	1.38%	96.1	28.5	875.4
2.80%	1.40%	1.40%	97.9	29.0	873.1
2.85%	1.43%	1.43%	99.6	29.5	870.8
2.90%	1.45%	1.45%	101.4	30.1	868.6
2.95%	1.48%	1.48%	103.1	30.6	866.3
3.00%	1.50%	1.50%	104.9	31.1	864.0
3.05%	1.53%	1.53%	106.6	31.6	861.8
3.10%	1.55%	1.55%	108.4	32.1	859.5
3.15%	1.58%	1.58%	110.1	32.7	857.2
3.20%	1.60%	1.60%	111.9	33.2	855.0
3.25%	1.63%	1.63%	113.6	33.7	852.7
3.30%	1.65%	1.65%	115.3	34.2	850.4
3.35%	1.68%	1.68%	117.1	34.7	848.2
3.40%	1.70%	1.70%	118.8	35.3	845.9
3.45%	1.73%	1.73%	120.6	35.8	843.6
3.50%	1.75%	1.75%	122.3	36.3	841.4
3.55%	1.78%	1.78%	124.1	36.8	839.1
3.60%	1.80%	1.80%	125.8	37.3	836.8
3.65%	1.83%	1.83%	127.6	37.8	834.6
3.70%	1.85%	1.85%	129.3	38.4	832.3
3.75%	1.88%	1.88%	131.1	38.9	830.0

Example Mixing Table for ACQ®-C2 and Q50-C to make ACQ Type D

Required Solution strength (% active)	Component balance (actives basis)		To mix 1000 gal treating solution combine the following quantities of		
	CuO	Quat	ACQ-C2 (gal)	Q50-C, Q50 or Q50M (gal)	Water (gal)
0.40%	0.27%	0.13%	18.6	2.8	978.6
0.45%	0.30%	0.15%	21.0	3.1	975.9
0.50%	0.33%	0.17%	23.3	3.5	973.3
0.55%	0.37%	0.18%	25.6	3.8	970.6
0.60%	0.40%	0.20%	28.0	4.1	967.9
0.65%	0.43%	0.22%	30.3	4.5	965.2
0.70%	0.47%	0.23%	32.6	4.8	962.6
0.75%	0.50%	0.25%	34.9	5.2	959.9
0.80%	0.53%	0.27%	37.3	5.5	957.2
0.85%	0.57%	0.28%	39.6	5.9	954.5
0.90%	0.60%	0.30%	41.9	6.2	951.8
0.95%	0.63%	0.32%	44.3	6.6	949.2
1.00%	0.67%	0.33%	46.6	6.9	946.5
1.05%	0.70%	0.35%	48.9	7.3	943.8
1.10%	0.73%	0.37%	51.3	7.6	941.1
1.15%	0.77%	0.38%	53.6	7.9	938.5
1.20%	0.80%	0.40%	55.9	8.3	935.8
1.25%	0.83%	0.42%	58.2	8.6	933.1
1.30%	0.87%	0.43%	60.6	9.0	930.4
1.35%	0.90%	0.45%	62.9	9.3	927.8
1.40%	0.93%	0.47%	65.2	9.7	925.1
1.45%	0.97%	0.48%	67.6	10.0	922.4
1.50%	1.00%	0.50%	69.9	10.4	919.7
1.55%	1.03%	0.52%	72.2	10.7	917.1
1.60%	1.07%	0.53%	74.6	11.1	914.4
1.65%	1.10%	0.55%	76.9	11.4	911.7
1.70%	1.13%	0.57%	79.2	11.7	909.0
1.75%	1.17%	0.58%	81.5	12.1	906.4
1.80%	1.20%	0.60%	83.9	12.4	903.7
1.85%	1.23%	0.62%	86.2	12.8	901.0
1.90%	1.27%	0.63%	88.5	13.1	898.3
1.95%	1.30%	0.65%	90.9	13.5	895.7
2.00%	1.33%	0.67%	93.2	13.8	893.0
2.05%	1.37%	0.68%	95.5	14.2	890.3

Required Solution strength (% active)	Component balance (actives basis)		To mix 1000 gal treating solution combine the following quantities of		
	CuO	Quat	ACQ-C2 (gal)	Q50-C, Q50 or Q50M (gal)	Water (gal)
2.10%	1.40%	0.70%	97.9	14.5	887.6
2.15%	1.43%	0.72%	100.2	14.9	885.0
2.20%	1.47%	0.73%	102.5	15.2	882.3
2.25%	1.50%	0.75%	104.8	15.6	879.6
2.30%	1.53%	0.77%	107.2	15.9	876.9
2.35%	1.57%	0.78%	109.5	16.2	874.2
2.40%	1.60%	0.80%	111.8	16.6	871.6
2.45%	1.63%	0.82%	114.2	16.9	868.9
2.50%	1.67%	0.83%	116.5	17.3	866.2
2.55%	1.70%	0.85%	118.8	17.6	863.5
2.60%	1.73%	0.87%	121.2	18.0	860.9
2.65%	1.77%	0.88%	123.5	18.3	858.2
2.70%	1.80%	0.90%	125.8	18.7	855.5
2.75%	1.83%	0.92%	128.2	19.0	852.8
2.80%	1.87%	0.93%	130.5	19.4	850.2
2.85%	1.90%	0.95%	132.8	19.7	847.5
2.90%	1.93%	0.97%	135.1	20.0	844.8
2.95%	1.97%	0.98%	137.5	20.4	842.1
3.00%	2.00%	1.00%	139.8	20.7	839.5
3.05%	2.03%	1.02%	142.1	21.1	836.8
3.10%	2.07%	1.03%	144.5	21.4	834.1
3.15%	2.10%	1.05%	146.8	21.8	831.4
3.20%	2.13%	1.07%	149.1	22.1	828.7
3.25%	2.17%	1.08%	151.5	22.5	826.1
3.30%	2.20%	1.10%	153.8	22.8	823.4
3.35%	2.23%	1.12%	156.1	23.2	820.7
3.40%	2.27%	1.13%	158.5	23.5	818.0
3.45%	2.30%	1.15%	160.8	23.8	815.4
3.50%	2.33%	1.17%	163.1	24.2	812.7
3.55%	2.37%	1.18%	165.5	24.5	810.0
3.60%	2.40%	1.20%	167.8	24.9	807.3
3.65%	2.43%	1.22%	170.1	25.2	804.7
3.70%	2.47%	1.23%	172.4	25.6	802.0
3.75%	2.50%	1.25%	174.8	25.9	799.3

Example Mixing Table for ACQ®-C2 and Ecovance™ wood preservative components

Solution strength (% active)	Component balance (actives basis)		To Mix 1000 gallons treating solution combine the following quantities of		
	CuO	DCOIT	ACQ-C2 (gal)	Ecovance (gal)	Water (gal)
0.50%	0.479%	0.021%	33.4	0.9	965.7
0.55%	0.527%	0.023%	36.8	1.0	962.2
0.60%	0.574%	0.026%	40.1	1.1	958.8
0.65%	0.622%	0.028%	43.5	1.1	955.4
0.70%	0.670%	0.030%	46.8	1.2	951.9
0.75%	0.718%	0.032%	50.2	1.3	948.5
0.80%	0.766%	0.034%	53.5	1.4	945.1
0.85%	0.814%	0.036%	56.9	1.5	941.6
0.90%	0.862%	0.038%	60.2	1.6	938.2
0.95%	0.910%	0.040%	63.5	1.7	934.8
1.00%	0.957%	0.043%	66.9	1.8	931.3
1.05%	1.005%	0.045%	70.2	1.9	927.9
1.10%	1.053%	0.047%	73.6	1.9	924.5
1.15%	1.101%	0.049%	76.9	2.0	921.0
1.20%	1.149%	0.051%	80.3	2.1	917.6
1.25%	1.197%	0.053%	83.6	2.2	914.2
1.30%	1.245%	0.055%	87.0	2.3	910.7
1.35%	1.293%	0.057%	90.3	2.4	907.3
1.40%	1.340%	0.060%	93.6	2.5	903.9
1.45%	1.388%	0.062%	97.0	2.6	900.4
1.50%	1.436%	0.064%	100.3	2.6	897.0
1.55%	1.484%	0.066%	103.7	2.7	893.6
1.60%	1.532%	0.068%	107.0	2.8	890.1
1.65%	1.580%	0.070%	110.4	2.9	886.7
1.70%	1.628%	0.072%	113.7	3.0	883.3
1.75%	1.676%	0.074%	117.1	3.1	879.8
1.80%	1.723%	0.077%	120.4	3.2	876.4
1.85%	1.771%	0.079%	123.8	3.3	873.0
1.90%	1.819%	0.081%	127.1	3.4	869.5
1.95%	1.867%	0.083%	130.4	3.4	866.1
2.00%	1.915%	0.085%	133.8	3.5	862.7