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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

May 7, 2007

Kevin Archer, Ph. D. Viance, LLC 200 East Woodlawn Road, Suite 350 Charlotte. North Carolina 28217

Subject: Product Name: TimberSaver

EPA Registration Number: 83997-8 Application Date: 25-Apr-2007 Receipt Date: 27-Apr-2007

Dear Dr. Archer:

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

Proposed actions:

- Revised labeling
- Alternate brand name: TIMBERSAVER ® PT

General label comments:

As per the boric acid RED, for all exterior uses, add the following PPE language to the label:

Personal Protective Equipment

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

- coveralls, long-sleeved shirt and long pants,
- socks and chemical resistant foot wear;
- goggles or face shield, and
- chemical resistant gloves

Sincerely,

Agam Heyward Product Manager 34

Regulatory Management Branch II Antimicrobials Division (7510C)

Enclosure: Stamped labeling

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TimberSaver®

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

CAUTION

See Side Panel for Additional Precautionary Statements and Practical Treatment

KEEP OUT OF REACH OF CHILDREN

Manufactured for: Viance, LLC. One Woodlawn Green, Suite 350 200 East Woodlawn Green Charlotte, NC 28217 ACCEPTED with COMMENTS EPA Letter Dated:
MAY - 7 2007

EMERGENCY PHONE: 1-800-424-9300 (CHEMTREC) Under the Federal Insecticide,

EPA REG. NO.: 83997-8 EPA EST. NO.: 10465-NC-01 Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 83997–8

Net Weight: _____ lbs.

Precautionary Statements: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food and feed. Do not leave container where children or animals may gain access.

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 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 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.

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

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. 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 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 nor 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 specified herein. Buyer accepts this material subject to these terms and 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.

TimberSaver 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 powderpost beetles (Lyctidae), furniture beetles and old house borers (Anobiidae), and Longhorn beetles (Cerambycidae). This treatment is not effective against wood staining fungi. TimberSaver also controls subterranean termites (Reticulitermes, Coptotermes, Heterotermes), dampwood termites (Zootermopsis), drywood termites (Kalotermes, Incisitermes), and carpenter ants, (Camponotus).

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

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 TimberSaver 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

Lumber Thickness	Pounds of TimberSaver for 100 Gallons Solution	Salution Temp.	Diffusion Complete In
Up to 1 inch (2.5 cm)	140	105°F (40°C)	2-4 weeks
1 to 1.75 inches (2.5 to 4.0 cm)	180	120°F (50°C)	4-6 weeks
1.75 to 2.5 inches (4.0 to 6.5 cm)	250	130°F (55°C)	4-6 weeks
2.5 to 3 inches* (6.5 to 7.5 cm)	280	135°F (57°C)	6-8 weeks

^{*} Lumber over 3 inches (7.5 cm) in thickness or over 5 inches (12.5 cm) 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 TimberSaver 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 washoff 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 Chemical Specialties, Inc. and/or those of the American Wood Preserver's Association (AWPA).

of attacking organisms. Apply two coats of a 10% aqueous solution of TimberSaver (1 lb./gallon solution). Solution may be applied by spray or brush until surface is thoroughly wetted (approximately 7-10 gallons per 1000 sq. ft.) Current Chemical Specialties, Inc. and/or American Wood Preservers' Association specifications and test methods should be followed to ensure adequate chemical loadings in wood. See Product Data Sheet for additional information.

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