

84397-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

MAR 18 2010

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ann M. Tillman
Pyxis Regulatory Consulting, Inc.
Agent for EnvironmentalRx, Inc.
4110 136th Street NW
Gig Harbor, WA 98332

Subject: **Moldban-10**
EPA Registration No.: 84397-1
Application Date: February 15, 2010
Receipt Date: February 16, 2010

Dear Ms. Tillman:

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

Proposed Notification:

Storage and Disposal Update per PR Notice 2007-4

General Comment:

Based on a review of the material submitted, the following comment applies:

A copy of the notification is accepted and has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at grigsby.stacey@epa.gov during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

Jacqueline McFarlane
(Acting) Product Manager (34)

Regulatory Management Branch II
Antimicrobials Division (751UP)

SYMBOL							
SURNAME							
DATE							



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 84397-1	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) EnvironmentalRx, Inc./Moldban-10	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Arizona Chemical Group P.O. Box 20464 Mesa, AZ 85277 <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.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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 checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4 oz, 8 oz, 1 gal, 5 gal, 55 gal		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" 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 Ann M. Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
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 Ann M. Tillman	5. Date 2/15/14	

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if absorbed through skin or inhaled. Causes eye irritation. Prolonged frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear the following:

- Long-sleeve shirt
- Long pants
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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 wash-waters or rinsate.

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.]

PHYSICAL AND CHEMICAL HAZARDS

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

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

GENERAL INFORMATION

Moldban-10 is an aqueous suspension of copper-8-quinolinolate. Low concentrations provide long term protection against fungal attack and will help prevent surface growth, musty odors, and premature product failure on textiles, wood, paper, paperboard, adhesives and paints. Products which are treated properly with Moldban-10 resist degradation by fungi or mildew after long-term exposure to heat, water and severe weathering conditions.

Examples of items which are protected with Moldban-10 include shoe counters, flooring felt, heavyweight fabrics such as tents, tarpaulins, webbing, awnings, and supply bags, adhesives, shoe liners, paints, paper, wallboards, wood, and similar systems that require an effective antimicrobial compound.

Restrictions:

Do not apply this product to animals, plants, potable water, food or feed stuffs.

Do not use for treated wood which will be in frequent or prolonged contact with bare skin.

To prevent possible injury to desirable plants, plants should be covered if they may be contacted by the solution during treatment.

Mixing Directions

Moldban-10 is to be diluted by addition of water. Add a small amount of the total required amount of water and stir until homogeneous. Then add the remaining amount of water. Avoid vigorous agitation.

Recommended Dose Levels

Paper and Paperboard Products: THIS PRODUCT IS ONLY FOR USE IN NON-FOOD APPLICATIONS, such as Brown Paper Mills, Sheet for corrugated Board, Kraft Paper, Newsprint and similar paper/paperboard not intended for food contact uses. Use a minimum level of 5.5% Moldban-10 by weight (equivalent to 0.1% Cu) for incorporation into the product. This rate is recommended to control mold, mildew and fungal degradation. Kraft papers are treated by dip and dry methods. Paperboard and heavy krafts are treated by adding the Moldban-10 to the pulp followed by thorough mixing of the pulp and Moldban-10.

Military shoe counter specifications: 0.5% to 0.10% Cu.

Textiles: Use a minimum level of 8.3% Moldban-10 by weight (equivalent to 0.15% Cu) for control of textiles mold, mildew and fungal degradation. Water repellants can be incorporated with Moldban-10 into the textiles. Before incorporating these products, check to be sure that the water repellant and Moldban-10 are compatible and form a uniform mixture that does not form flakes, sludges, jells, oily films or layers, or other precipitates. If these are observed, the mixture of Moldban-10 with the water repellant should not be used.

Wood: Moldban-10 is recommended for the control of wood decay of items with above-ground uses. Such items include decking for trucks, patios, and swimming pools; ladders, boat interiors, gypsum board or panelings in shower rooms. Dilute Moldban-10 as a 1:10 dilution in water. Dip the wood to be treated in the Moldban-10 solution for three minutes. Alternatively, the wood can be painted using 1 gallon of the 1:10 Moldban-10 dilution per 450 sq. ft. of wood.

Adhesives: For dried-film protection of adhesives and glues, use Moldban-10 at 2.8% to 5.8% by weight of the dry material. Synthetic emulsions (ethylene-vinyl acetate) and naturally-derived starches, dextrans and animal glues are protected from mildew by a thorough mixing of the Moldban-10 in the final compounding of the adhesive.

Paints: Add Moldban-10 to interior latex paints at rates ranging from 1% to 10% by volume of paint. Optimum protection of the paint film from mold and mildew are obtained with dose levels of 7.5% (v/v).

For Sapstain Control to Wood: Apply Moldban-10 to freshly cut softwood or hardwood lumber or to debarked timber within 24 hours of sawing or planning. Under warm weather conditions, the time between sawing or planning and application is more important. Select the Moldban-10 application rate based on the type of lumber to be treated, the type of storage or shipping conditions under which the lumber or wood will be transported, and the length of sapstain control desired. The higher rates are used for hard-to-wet woods (.i.e., Douglas Fir), when the conditions for wood disease are expected to be severe, when weather conditions are hot and humid, and when extended length of protection from sapstain is desired.

Moldban-10 can be applied using calibrated sprays, most effective for treating debarked timer and lumber, or by dipping treatments, if the equipment allows complete coverage of the wood surface. Maintain proper dilution ratios of the spray mixture or dipping tank solutions by routinely measuring the concentration of Moldban-10 in these solutions.

Lumber treated with Moldban-10 must be stored under cover, indoors, or at least 100 feet from any pond, lake, stream, wetland, or river to prevent possible runoff of the product into the waterway. Treated lumber stored within 100 feet of a pond, lake, stream, wetland, or river must be either covered with plastic or surrounded by a berm to prevent surface water runoff into the nearby waterway. If a berm or curb is used around the site, it should consist of impermeable material (clay, asphalt, concrete) and be of sufficient height to prevent runoff during heavy rainfall events.

Spray Applications: Dilute Moldban-10 with water by mixing 1 part Moldban-10 with between 15 and 60 parts water. Apply as a coarse spray to thoroughly cover the wood surface. Collect any solution that runs off from the treated wood so it can be re-used. One gallon of the diluted spray solution will treat 150 to 250 sq. ft. of wood, depending on the wood type.

Dip Applications: Dilute Moldban-10 with water by mixing 1 part Moldban-10 with between 15 and 40 parts water. Ensure that the placement of the wood allows all wood surfaces to be completely covered by the treatment solution. Allow the wood to be immersed in the treatment solution for a minimum of three minutes. After removing the wood from the dipping equipment, allow any treatment solution to drip back into the equipment for re-use. Five to ten gallons of the diluted dipping solution will treat 1,000 board feet.

Handling Precautions

Moldban-10 will stain clothing. Its green color will be difficult to remove.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not allow to freeze.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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:

For containers equal to or less than 5 gallons: Non-refillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available.

For containers greater than 5 gallons: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.



