

84661-4

05/22/2008

1/5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 22, 2008

Ronald L. Miller  
Director of Registrations  
**PhibroWood, LLC**  
65 Challenger Road, 3<sup>rd</sup> FL  
Ridgefield Park, NJ 07660

Subject: **Everlast CA-B2**  
EPA Registration No. 84661-4  
Application Dated: May 12, 2008  
Receipt Date: May 13, 2008

Dear Mr. Miller:

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

**Proposed Amendment:**

- Updated labeling
- Changing Primary brand name to "Sustain 20T"

**Other comments:**

A stamped copy of the accepted labeling is enclosed.

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/pesticides/regulating/registering/submissions/index.htm>. 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>.

Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6422 or email address at: [heyward.adam@epa.gov](mailto:heyward.adam@epa.gov), or Renae Whitaker telephone at (703) 308-7003 or email address at: [whitaker.renae@epa.gov](mailto:whitaker.renae@epa.gov) during the hours of 8:00 am to 3:30 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 Management Branch II  
Antimicrobials Division (7510P)

Enclosure: EPA stamped approved labeling

3/5

# PhibroWood®

## Sustain™ 20T

MCA Wood Preservative

FOR PRESSURE-TREATING WOOD PRODUCTS

**ACTIVE INGREDIENT:**

Copper Carbonate*	34.795%
Tebuconazole [Alpha-[2-(4-chlorophenyl)ethyl]-alpha-(1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol]	0.812%
<b>OTHER INGREDIENTS: **</b>	<b>64.393%</b>
<b>TOTAL:</b>	<b>100.0%</b>

(\*Metallic Copper Equivalent 20.00%)

(\*\* THIS PRODUCT CONTAINS SODIUM NITRITE)

### KEEP OUT OF REACH OF CHILDREN CAUTION

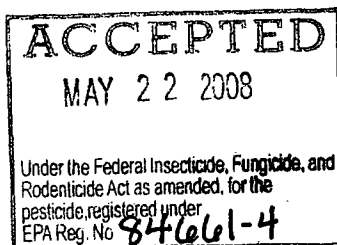
FIRST AID	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.</li> <li>Remove contact lenses, if present, after the first five minutes, and then continue rinsing.</li> <li>Call a Poison Control Center to doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>Call a Poison Control Center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not give anything by mouth to an unconscious person.</li> <li>Do not induce vomiting unless told to do so by a Poison Control Center or doctor.</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 mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</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>
HOT LINE NUMBER	
For medical emergencies involving this product, call toll free 1-888-324-7598. 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."	

EPA Reg. No. 84661-4

EPA Est. No. 35896-SC-001  
35896-IL-001

Net Weight: \_\_\_\_\_

**Manufactured for:**  
PhibroWood, LLC  
65 Challenger Road, 3<sup>rd</sup> Floor  
Ridgefield Park, NJ 07660



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

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic organisms. 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of EPA.

**USER SAFETY RECOMMENDATIONS**

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse.  
**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. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly, and change into clean clothing.

**PERSONAL PROTECTIVE EQUIPMENT**

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Socks
- Shoes

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

**GENERAL INFORMATION**

Pressure-treating wood products with Sustain™ 20T provides protection against termites, ascomycetes, white rot, brown rot and dry rot.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use this product without reading the Manual and having the necessary safety equipment.

Sustain™ 20T is only for use in pressure-treating wood products. Apply using vacuum pressure impregnation with water solutions having concentrations ranging from 0.1% - 3.0% active ingredients by weight. Impregnation procedures must rigidly adhere to the current specifications of PhibroWood, LLC or the American Wood-Preservers' Association.

The processes used to apply Sustain™ 20T formulations must leave no visible surface deposits on the wood. Visible surface deposits indicate a surface residue or crystallization on the treated wood. Small, isolated or infrequent spots of chemical on otherwise clean wood are permitted.

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a cool, dry and well ventilated area. Keep in tightly closed containers. Store away from incompatible materials. Protect containers from physical damage. Observe all applicable local, state and federal guidelines for storage and disposal.

**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, reconditioning or incineration, or puncture and dispose of in a sanitary landfill, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

PhibroWood, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of PhibroWood, LLC. In no case shall PhibroWood, LLC be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damages resulting from or in any way arising from the use, handling or application of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for this product or, at CP Chemicals, Inc. election, the replacement of this product. CP CHEMICALS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.