

84661-7

11/13/2008

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U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Number: 84661-7

Date of Issuance: November 13, 2008

Term of Issuance: Unconditional

Name of Pesticide Product: Sustain™ 25 Antimicrobial

NOTICE OF PESTICIDE:

- x Registration
Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

PhibroWood LLC
65 Challenger Road, 3rd Floor
Ridgefield, NJ 07660

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product [OPP Decision Number: D-397120] is unconditionally registered in accordance with FIFRA sec 3(c)(5) provided that you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA sec 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling changes listed below before you release the product for shipment:
a. Revise the EPA Registration Number to read, "EPA Reg. No. 84661-7."
b. Delete the precautionary statement from the user safety recommendations section of the label.

Signature of Approving Official:

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

Date:

November 13, 2008

c. Revise the precautionary statement and heading to read as follows:

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

Harmful if swallowed or adsorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

3. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,

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

Enclosure: (Stamped Label)

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PhibroWood®

The Wood Protection Experts™

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 13 2008

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

84661-7

Sustain™ 25 Antimicrobial

For use as a Wood and Burlap Preservative

ACTIVE INGREDIENT:

Copper Carbonate, CAS # 12069-69-1* 43.5 %

OTHER INGREDIENTS:** 56.5 %

TOTAL 100.0 %

*METALLIC COPPER EQUIVALENT - 25.0 %
(** THIS PRODUCT CONTAINS SODIUM NITRITE)

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. • Remove contact lenses, if present, after the first five minutes, and then continue rinsing. • Call a Poison Control Center to 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 give anything by mouth to an unconscious person. • Do not induce vomiting unless told to do so by a Poison Control Center or doctor.
IF INHALED	<ul style="list-style-type: none"> • 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.
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.
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."	

PhibroWood, LLC
Ridgefield Park, NJ 07660

EPA REG. NO. 84661-XX

EPA EST. NO. 35896-SC-01

Net Contents: _____

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

USER SAFETY RECOMMENDATIONS

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should 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. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Mixers, loaders, applicators and other handlers must wear the following:

- Long-sleeved shirt
- Long pants
- Shoes plus socks
- Eye protection such as goggles, face shield, or safety glasses
- Rubber gloves

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. Wash the outside of gloves before removing.

NOTE: Applicators must not eat, drink, or use tobacco products during those parts of the application process where exposure to the wood treatment formulation may occur (e.g., manually operating cylinder doors, handling freshly treated wood, etc.).

Environmental Hazards

This product is toxic to fish and aquatic invertebrates and may contaminate water through runoff. Do not contaminate water by cleaning of equipment or disposal of 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.

Certain water conditions including low pH (≤ 6.5), low dissolved organic carbon (DOC) levels (3.0 mg/L or lower), and "soft" waters (i.e. alkalinity less than 50 mg/L), increase the potential acute toxicity to aquatic organisms.

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 use. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

General Information

Sustain™ 25 is for use to control fungal decay of wood products including lumber, timbers, landscape ties, fence posts, building and utility poles, land, freshwater and marine piling, seawalls, decking and wood shingles. Sustain™ 25 may also be used to treat burlap for agricultural, horticultural, nursery and military uses. Sustain™ 25 is effective against brown, white, and soft rot, and wood eating insects.

Application Instructions

Burlap Treatment

Sustain™ 25 is a copper-based mildewcide specifically formulated to impart fungus resistance on burlap for agricultural, horticultural, and nursery uses. Sustain™ 25 may also be used on burlap in accordance with Military Specification MIL-F-46032A. The operational procedure to obtain a treated product that will pass the product specifications requires the use of a treating tank that is not constructed of or contains any brass or bronze materials.

Dilute the concentrated Sustain™ 25 1:5 with water in the treatment tank and immerse the burlap to be treated. Keep the burlap submerged in the tank until the burlap has obtained an analysis of 1.5% to 2.0% metallic copper measured on a dry basis.

Wood Treatment

Use Sustain™ 25 to treat any type of wood to be used above ground, in ground, or in water that will be exposed to conditions favorable to rot, decay or insect attack.

Tank mix Sustain™ 25 with quaternary ammonium compounds approved for wood treatment. Apply the tank mix solution by pressure impregnation. Follow the instructions in the Mixing Table to obtain the desired solution concentration. The percent solution to be used should be based on the retention in pounds per cubic foot (PCF) as specified by the purchaser and by the treating process used.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store unused product in original containers only in a cool, well-ventilated location out of the reach of children and animals.

Pesticide Disposal: Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide 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: Plastic Container – Triple rinse (or equivalent). Then offer for recycling or reconditioning, 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.

Metal Container – 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.

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 PhibroWood, LLC election, the replacement of this product. PhibroWood, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

PhibroWood, LLC
65 Challenger Road
Ridgefield Park, NJ 07660

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Mixing Table for Sustain™ 25 Wood Preservative and 50% Didecyl Dimethyl Ammonium Carbonate (2-Component System)

Solution Strength % Active	Component Balance Actives Basis (%)		To Mix 1000 Gallons Solution Combine Following Gallons of		
	CuO	DDACarbonate	Sustain™ 25	DDACarbonate (50%)	Water
0.60%	0.400%	0.200%	8.2	4.16	987.7
0.65%	0.433%	0.217%	8.8	4.51	986.7
0.70%	0.467%	0.233%	9.5	4.86	985.6
0.75%	0.500%	0.250%	10.2	5.21	984.6
0.80%	0.533%	0.267%	10.9	5.55	983.6
0.85%	0.567%	0.283%	11.6	5.90	982.5
0.90%	0.600%	0.300%	12.3	6.25	981.5
0.95%	0.633%	0.317%	12.9	6.60	980.5
1.00%	0.667%	0.333%	13.6	6.95	979.4
1.10%	0.733%	0.367%	15.0	7.66	977.3
1.20%	0.800%	0.400%	16.4	8.36	975.3
1.30%	0.867%	0.433%	17.8	9.06	973.2
1.40%	0.933%	0.467%	19.1	9.77	971.1
1.50%	1.000%	0.500%	20.5	10.47	969.0
1.60%	1.067%	0.533%	21.9	11.18	966.9
1.70%	1.133%	0.567%	23.3	11.89	964.8
1.80%	1.200%	0.600%	24.7	12.59	962.7
1.90%	1.267%	0.633%	26.1	13.30	960.6
2.00%	1.333%	0.667%	27.5	14.01	958.5
2.10%	1.400%	0.700%	28.9	14.73	956.4
2.20%	1.467%	0.733%	30.3	15.44	954.3
2.30%	1.533%	0.767%	31.7	16.15	952.2
2.40%	1.600%	0.800%	33.1	16.87	950.1
2.50%	1.667%	0.833%	34.5	17.59	947.9
2.60%	1.733%	0.867%	35.9	18.30	945.8
2.70%	1.800%	0.900%	37.3	19.02	943.7
2.80%	1.867%	0.933%	38.7	19.74	941.6
2.90%	1.933%	0.967%	40.1	20.46	939.4
3.00%	2.000%	1.000%	41.5	21.18	937.3
3.10%	2.067%	1.033%	42.9	21.91	935.2
3.20%	2.133%	1.067%	44.4	22.63	933.0
3.30%	2.200%	1.100%	45.8	23.36	930.9
3.40%	2.267%	1.133%	47.2	24.08	928.7
3.50%	2.333%	1.167%	48.6	24.81	926.6
3.60%	2.400%	1.200%	50.1	25.54	924.4
3.70%	2.467%	1.233%	51.5	26.27	922.2
3.80%	2.533%	1.267%	52.9	27.00	920.1
3.90%	2.600%	1.300%	54.4	27.73	917.9