

88911-1

6/26/2013

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Madhu Mandava
Agent for Eagle Labs, Inc.
Mandava Associates, LLC.
6860 N Dallas Parkway, Suite 200
Plano, TX 75024

JUN 26 2013

Subject: Product Name: Liquid Copper Sulfate
EPA Reg. No. 88911-1
Submission date: 5/22/2013
Notification of minor label change to correct a typographical error in the
Storage and Disposal Statement
OPP Decision Number: 479529

Dear Mr. Mandava:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The Agency accepts the proposed minor label change to correct a typographical error in the Storage and Disposal Statement. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions concerning this letter, please contact Kaitlin Keller at 703-308-8172 or keller.kaitlin@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Kish for".

Tony Kish
Product Manager 22
Fungicides Branch
Registration Division (7504P)

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0080

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 88911	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Liquid Copper Sulfate	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Eagle Labs, Inc. P.O. BOX 645 DESOTO, TX 75123 <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: <input checked="" type="checkbox"/> 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 to fix a typographical error contained in the Storage and Disposal Statement of the Label.
 Please send all correspondence to Mandava Associates, L.L.C, 6860 N. Dallas Pkwy, Suite 200, Plano, TX 75024 Attn: Madhu Mandava
 E-mail: madhu@mandava.com

Section - III

1. Material This Product Will Be Packaged In:

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	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container	

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
 55, 275, 800Gal

5. Location of Label Directions
 On Label
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
 Lithograph
 Paper glued
 Stenciled Other _____


Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Madhu Mandava	Title Agent for Eagle Labs, Inc	Telephone No. (Include Area Code) 972-265-7324
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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.

2. Signature 	3. Title Agent for Eagle Labs, Inc	6. Date Application Received (Stamp)
4. Typed Name Madhu Mandava	5. Date March 12, 2013	

3/9

5/30

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

6860 N Dallas Parkway, Suite 200, Plano, TX 75024

Telephone: (972) 265-7924 / E-MAIL: Madhu@Mandava.com / www.Mandava.com

Via Federal Express:

March 12, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Tony Kish
Fungicide Branch PM (22)
Registration Division (7504P)

Subject: Eagle Labs, Inc.
Eagle Labs, Inc., EPA Registration No. 88911-1, Liquid Copper Sulfate,
Notification to Correct a Typographical Error.

Dear Mr. Kish:

On behalf of Eagle Labs, Inc., we are submitting a notification application for Liquid Copper Sulfate, EPA Registration No. 88911-1, to correct a typographical error contained in the Storage and Disposal Statement.

Included with this submission please find the following:

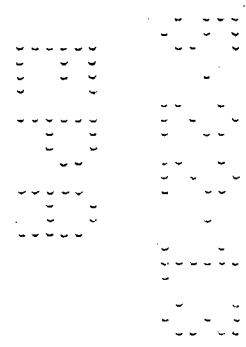
1. Application for Pesticide Registration Notification (EPA Form 8570-1)
2. ~~Two~~ ^{One} Copies of Proposed Label Notification with Changes Clearly Marked
3. One Copy of Previously Approved Label

If you should have any questions, please contact me at 972-265-7924

Sincerely Yours,



Madhu Mandava
Agent for Eagle Labs, Inc.



Eagle Labs, Inc. [Company Logo]

[Bracketed text denotes alternate marketing language and use directions]

LIQUID COPPER SULFATE

Intended for Industrial Use Only

Active Ingredient:

Copper sulfate pentahydrate (CAS# 7758-99-8)* 25.0%

Other Ingredients: 75.0%

TOTAL: 100.0%

*Metallic copper equivalent = 6.4%

NOTIFICATION

JUN 26 2013

KEEP OUT OF REACH OF CHILDREN DANGER

For applications in waters destined for use for use as drinking water, those waters must receive additional and separate water treatment. Do not apply more than 1.0 ppm as metallic copper in these waters.

See side panel for specific pesticide use directions. See [Side] [Back] Panel for [Additional Precautionary Statements and First Aid]

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 5 minutes, and then continue rinsing. • Call a poison control center or doctor for 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.
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. • Avoid alcohol. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything to an unconscious person.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information call the National Pesticides Information Center at 1-800-858-7378, 7:30 AM to 3:30 PM Pacific Time (PT), Monday thru Friday. During other times, call the poison control center 1-800-222-1222</p>	
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Contact with copper sulfate may result in conjunctivitis and corneal ulceration of the eyes, dermatitis and burns of the skin. Poisoning may occur via absorption through abraded skin.</p>	

EPA Reg. No. 88911-1
Batch/Lot No. _____

EPA Est. No. 88911-TX-001
88911-TX-002

Net Contents: 55 Gallons
30 Gallons

Manufactured by:
EAGLE LABS, INC., P.O. BOX 645, DESOTO, TX 75123

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

DANGER. Corrosive. Causes irreversible eye damage. Causes skin burns. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. May be fatal if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE):

Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, PVC and viton. If you want more options, follow the instructions for category C on an EPA chemical-resistance category selection chart. Mixers, loaders, applicators and other handlers must wear the following:

- Coveralls over long-sleeved shirt and long pants.
- Chemical resistant gloves made of any waterproof material, goggles or face shield, and chemical resistant footwear with socks.
- When mixing and loading wear a chemical resistant apron.

Wash outside of gloves before removing. Follow the 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 materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

User Safety Recommendations:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. User 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. Wash the outside of gloves before removing.

For applications in waters destined for use for use as drinking water, those waters must receive additional and separate water treatment. Do not apply more than 1.0 ppm as metallic copper in these waters.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Waters treated with this product may be hazardous to aquatic organisms. Treatment of aquatic weeds and algae can result in oxygen loss from decomposition of dead algae and weeds. This oxygen loss can cause fish and invertebrate suffocation. To minimize this hazard, do not treat more than 1/2 of the water body to avoid depletion of oxygen due to decaying vegetation. Wait at least 14 days between treatments. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State or local agency with primary responsibility for regulating pesticides before applying to public waters, to determine if a permit is required.

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), increases the potential acute toxicity to non-target 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 application. For requirements specific to your State, consult the agency responsible for pesticide regulations.

PRODUCT INSTRUCTIONS

Water hardness, temperature of the water, the type and amount of vegetation to be controlled, and the amount of water flow are to be considered in using Copper Sulfate to control algae. Begin treatment soon after plant growth has started. If treatment is delayed until a large amount of algae is present, larger quantities of Copper Sulfate will be required. Algae are difficult to control with Copper Sulfate when water temperatures are low or water is hard. Larger quantities of Copper Sulfate will be required to kill and control algae in water which is flowing rather than in a body of stagnant water. If possible, curtail the flow of water before treatment and hold dormant for approximately three (3) days after treatment or until the algae have begun to die. It is usually best to treat algae on a sunny day when the heavy mats of filamentary algae are most likely to be floating on the surface where it can be sprayed directly. If there is some doubt about the concentration to apply, start with a lower concentration and increase this concentration until the algae is killed or the maximum allowable use rate is reached.

Treatment of algae can result in oxygen loss from decomposition of dead algae. This loss can cause fish suffocation. Therefore, to minimize this hazard, treat one-third to one-half of the water area in a single operation and wait 14 days between treatments. Begin treatments along the shore and proceed outward in bands to allow fish to move into untreated water. NOTE: if treated water is to be used as a source of potable water, the metallic copper applied must not exceed 1 ppm (4 ppm copper sulfate pentahydrate).

CALCULATIONS FOR THE AMOUNT OF WATER IMPOUNDED AND FOR THE AMOUNT OF LIQUID COPPER SULFATE TO BE USED: Calculate water volume as follows: 1) Obtain surface area by measuring of regular shaped ponds or mapping of irregular ponds or by reference to previously recorded engineering data or maps. 2) Calculate average depth by sounding in a regular pattern and taking the mean of these readings or by reference to previously obtained data. 3) Multiply surface area in feet by average depth to obtain cubic feet of water volume. 4) Multiply surface area in acres by average depth in feet to obtain total acre-feet of water volume.

CALCULATE WEIGHT OF WATER TO BE TREATED AS FOLLOWS: 1) Multiply volume in cubic feet by 62.44 to obtain total pounds of water, or 2) Multiply volume in acre feet by 2,720,000 to obtain pounds of water.

CALCULATIONS OF ACTIVE INGREDIENT TO BE ADDED: To calculate the amount of Liquid Copper Sulfate needed to achieve the labeled concentration, multiply the weight of water by the label concentration of Liquid Copper Sulfate. Since labeled concentrations are normally given in parts per million (ppm), it will first be necessary to convert the value in parts per million to a decimal equivalent. For example, 8 ppm is the same as 0.000008 when used in this concentration. Therefore, to calculate the amount of Liquid Copper Sulfate to treat 1 acre-foot of water with 8 ppm Liquid Copper Sulfate (LCS), the calculation would be as follows:

$$0.000008 \times 2,720,000 = 21.75 \text{ lbs} \times 1 \text{ gal LCS}/9.85 = 2.2 \text{ gal LCS}$$

SPECIFIC INSTRUCTIONS

The following applies for waters segregated for Municipal Water Utilities in treatment of potable water only.

Dosages to control algae in impounded waters, ponds, and reservoirs should be calculated per million gallons as follows:

1 MMg x 8.344 pounds per gallon x 8 ppm = 66.75 pounds liquid copper sulfate per MMg raw water (maximum use) x 1 gal per 9.85 pounds = 6.75 gallons Liquid Copper Sulfate per MMg raw water. This is the equivalent of 8 parts per million (ppm) Liquid Copper Sulfate which delivers 0.05 ppm metallic copper.

For flowing systems such as raw water intake, use same dosage ratio so that the maximum usage remains 6.75 gallons Liquid Copper Sulfate per day per MMg per day raw water.

Successful algae treatment can be accomplished at much lower dosages. Treatment dosages can be as low as 1/20 the maximum or 0.68 gallon Liquid Copper Sulfate per MMg water.

To control algae in impounded waters, lakes, ponds and reservoirs: There are several methods to apply Liquid Copper Sulfate to impounded water. The most satisfactory and simplest method is to pump injection at the intake pipes located between irrigation canal and reservoir. Bulk Copper sulfate tanks should be metered and regulated to coincide with the start of the irrigation pump. Dosage not to exceed 8 ppm Liquid Copper Sulfate which delivers 1/2 ppm active copper.

LIQUID COPPER SULFATE (LCS) REQUIRED FOR TREATMENT OF DIFFERENT GENERA OF ALGAE

The genera algae that are listed below are commonly found in waters of the United States. Use the lower labeled rate in soft waters (less than 50 ppm, methyl orange alkalinity) and the higher concentration in hard water (above 50 ppm alkalinity). Always consult State Fish and Game Agency before applying this product to municipal waters

ORGANISMS	1-2 ppm LCS*	2-4 ppm LCS*	4-6 ppm LCS*	6-8 ppm LCS*
Cyanophyceae (Blue-green)	Anabaena Anacystis Aphanizomenon Gloeotrichia Gomphosphaeria Polycystis Rivularia	Cyldrosperrum Oscillatoris Plectonema	Nostoc Phormidium	Calothrix Symploca
Chlorophyceae (Green)	Closterium Hydrodictyon Spyrogyra lothrix	Botryococcus Cladophora Coelastrum Draparnaldia Enteromorpha Gloeocystis Microspora Tribonema Zygnema	Chlorelia Crucigenia Desmidium Golenkinia Oocystis Palmella Pithophora Staurationum Tetraedron	Ankistrodesmus Chara Nitella Scenedesmus
Diatomaceae (Diatoms)	Asterionella Fragilaria Melosira Navicula	Gomphonema Nitzchia Stephanodiscus Synedra Tabellaria	Achnanthes Cymbella Nudum	
Protozoa (Flagellates)	Dinobryon Synura Uroglena Volvox	Ceratium Cryptomonas Euglena Glenodinium Mallomonas	Chlamydomonas Hawmatococcus Peridinium	Eudorina Pandorina

*1-2 ppm LCS (0.0625-0.125 ppm active copper) = 0.28 – 0.55 gals/acre ft.

*2-4 ppm LCS (0.125-0.25 ppm active copper) = 0.55 – 1.10 gals/acre ft.

*4-6 ppm LCS (0.25-0.375 ppm active copper) = 1.10 – 1.56 gals/acre ft.

*5-8 ppm LCS (0.3125-0.5 ppm active copper) = 1.65 – 2.21 gals/acre ft.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep pesticide in original container. Do not put concentrate or dilutions of concentrate in food or drink containers.

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 HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{3}{4}$ 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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.