



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 21, 2003

Ronald L. Miller
Director of Registrations
Phibro-Tech, Inc.
2395 Cains Mill Road
P.O. Box 1979
Sumter, S.C. 29154

Subject: **Wood-Last**
EPA Registration No. 35896-2
Your Application Dated September 9, 2003

Dear Mr. Miller:

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

Proposed Label Amendment

Response to PR Notice 2001-1

Label Comment:

Revise Storage and Disposal statement to read:

STORAGE AND DISPOSAL

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

Pesticide Storage: (You must provide storage text)

Pesticide Disposal: Pesticide wastes are...Office for guidance.

Container Disposal: Triple rinse...local procedures. Do not reuse empty container.

General Comments

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

PHIBRO-TECH, INC.

RESTRICTED USE PESTICIDE
DUE TO ACUTE TOXICITY AND BECAUSE THIS PRODUCT CONTAINS ARSENIC AND/OR CHROMIUM COMPOUNDS SOME TYPES OF WHICH HAVE BEEN ASSOCIATED WITH TUMOR DEVELOPMENT IN HUMANS. For retail sale to and use only by certified applicators or persons under their direct supervision, and for those uses covered by the certified applicator's certification.

WOOD LAST

Chromated Copper Arsenate
Concentrated Wood Preservative
Aqueous 50% Solution CCA-Type C

ACTIVE INGREDIENTS:

Chromium Trioxide (CrO ₃).....	24.2%
Copper Oxide (CuO).....	9.2%
Arsenic Pentoxide (As ₂ O ₅).....	16.6%

OTHER INGREDIENTS:

.....	50.0%
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TOTAL	100.0%
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ACCEPTED
with COMMENTS
EPA Letter Dated:

NOV 21 2003

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

35896-2

Total elemental arsenic (all in water soluble form) 10.8%

Net Contents: 220 gallons

EPA Reg. No. 35896-2

EPA Est. No. 35896-SC-1

**KEEP OUT OF REACH OF CHILDREN
DANGER-PELIGRO
POISON**

FIRST AID

IF SWALLOWED:

Call a poison control center or doctor immediately for treatment advice. Have a 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 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.

IF IN EYES:

Hold eye open and rise 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 treatment advice.

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 use of gastric lavage.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER
POISONOUS IF SWALLOWED OR ABSORBED THROUGH THE SKIN**

Corrosive. Causes irreversible eye damage, skin or mucous membrane irritation. Harmful or fatal if swallowed, inhaled, or absorbed through skin. Do not breathe spray mist. Wash thoroughly after handling and before eating and smoking. Wear eye protection devices and protective clothing and rubber gloves in all situations where dermal contact is expected. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (i.e., handling freshly treated wood and manually opening cylinder doors).

Individuals who enter pressure treatment cylinders and other related equipment that is contaminated with the wood treatment solution (i.e., cylinders that are in operation or are not free of the treatment solution) must wear protective clothing, including overalls, jacket, gloves and boots, impervious to the wood treatment formulation. In addition, individuals who enter pressure-treatment cylinders must wear properly fitting, well-maintained, high efficiency filter respirators. MSHA/NIOSH-approved for inorganic arsenic, if the level of inorganic in the plant is unknown or exceeds 10 micrograms per cubic meter of air ($10 \mu\text{g}/\text{m}^3$) average over an 8-hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

DIRECTIONS FOR USE

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

WOOD LAST Chromated Copper Arsenate Concentrate is for use after dilution only in pressure vessel equipped wood treating plants for manufacture of preserved wood products. Dilute this 50% solution to concentrations prescribed in American Wood Preservers Association Standards to achieve penetration and retention levels desired.

Pesticide Application Requirement: Drillage shall be contained within the commercial pesticide application process so as to avoid contact with the ground and to allow the pesticide to continue to be used.

Drillage: All wood preserving pesticide that drips from pressure treated wood products during the final stage of the pesticide application process while treatment pressure is allowed to equalize.

Drip Area: The drip area is integral to the commercial pesticide application process. It is the area where pesticide not retained by the treated wood product is collected and contained for reapplication. Drip areas include the treating cylinder and designated surfaced areas outside the cylinder. Pressure treated wood products shall remain in the process drip area until drillage has ceased. (Drillage has ceased when the material is handled and no further drillage is observed to occur.)

Effective December 31, 2003, this product may only be used for preservative treatment of the following categories of forest products and in accordance with the respective cited standard (noted parenthetically) of the 2001 edition of the American Wood Preservers' Association Standards: Lumber and timber for Salt Water Use Only (C2), Piles (C3), Poles (C4), Plywood (C9), Wood for Highway Construction (C14), Poles, Piles and Posts Used as Structural Members on Farms and Plywood Used on Farms (C16), Wood for Marine Construction (C18), Round Poles and Posts Used in Building Construction (C23), Sawn Timber Used to Support Residential and Commercial Structures (C24), Sawn Crossarms (C25), Structural Glued Laminated Members and Laminations Before Gluing (C28), Structural Composite Lumber (C33), and Shakes and Shingles (C34). Forest products treated with this product may only be sold or distributed for uses within the AWPAs Commodity Standards under which treatment occurred.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. 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 apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwaters.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 OR CHEMICAL HAZARDS

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

Note to User: Examples of acceptable materials for protective clothing (i.e., gloves, coveralls, jackets and boots) required during application and handling of inorganic arsenicals are; vinyl, polyvinyl chloride (PVCP, neoprene, NBR (Buna-N), rubber and polyethylene.

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

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 or reconditioning or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

USER SAFETY RECOMMENDATIONS

Applicators must not eat, drink, or use tobacco products during those parts of the application process that may expose them to the wood treatment formulation (i.e., manually opening/closing cylinder doors, moving trams out of cylinders, mixing chemicals, and handling freshly treated wood).

User should wash hands before eating, drinking, chewing gum, using tobacco products or using the toilet. User should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

PERSONAL PROTECTIVE EQUIPMENT

Handlers must wear: goggles or faceshield, coveralls worn long-sleeved shirt and long pants, chemical-resistant gloves (such as Barrier Laminate, Butyl Rubber, Neoprene Rubber, Nitrile Rubber), shoes plus socks, dust/mist filter respirator (MSHA/NIOSH approved number prefix TC-21C) or NIOSH approved respirator with any N, R, P or HE prefilter.

Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and workshoes or boots and equipment at the plant. Worn-out protective clothing and workshoes or boots must be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with State and Federal regulations.

Individuals in the work area of an arsenical wood treatment plant must wear properly fitting, well-maintained high efficiency filter respirators, MSHA/NIOSH-approved for inorganic arsenic, if the level of inorganic arsenic in the plant is unknown or exceeds 10 micrograms per cubic meter of air (10 ug/m³) average over an 8 hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

WARRANTY STATEMENT

PHIBRO-TECH, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions. THERE ARE NO OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING A WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE. This warranty does not extend to the handling or use of this product contrary to label instructions or under abnormal conditions or under conditions nor reasonably foreseeable to seller and buyer assumes all risk of any such use.

PHIBRO-TECH, INC.
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