

363-14

8/12/2014

Page 189



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

AUG 12 2014

Micah T. Reynolds  
Regulatory Consultant for Coopers Creek Chemical Corporation  
Technology Sciences Group Inc.  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, D.C. 20036

**Subject: Amended Reregistration Label**  
C-4 Brand Black Creosote Coal Tar Solution  
EPA Registration Number: 363-14  
EPA Decision Number: 455179

Dear Mr. Reynolds:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the **Coal Tar Creosote RED** and has concluded that your submission is acceptable.

NOTE: This product is **not** being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please note that the record for this product currently contains the Confidential Statement of Formulation (CSF) listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated September 3, 2013

A copy of your label stamped "Accepted" is enclosed along with copies of the acute toxicity and product chemistry reviews completed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

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.jacqueline@epa.gov](mailto:campbell.jacqueline@epa.gov) or Srinivas Gowda by telephone at (703) 308-6354 or by e-mail at [gowda.srinivas@epa.gov](mailto:gowda.srinivas@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,

A handwritten signature in black ink, appearing to read "Jacqueline Hardy".

Jacqueline Hardy  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosure: Stamped label

289

**RESTRICTED USE PESTICIDE**  
Due to chronic toxicity in animal studies  
For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

**THE C-4 BRAND**  
**BLACK CREOSOTE COAL TAR SOLUTION**  
FOR PRESSURE TREATMENT OF WOOD

**ACCEPTED**  
08/12/2014  
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 363-14

<b>Active Ingredient:</b>	
Coal Tar Creosote (AWPA P2)	95.0 %
CAS No. 8001-58-9	
<b>Inert Ingredients</b>	<u>5.0 %</u>
<b>Total</b>	<b>100.0 %</b>

**CAUTION**

See (side) (back) (other) panel for additional precautionary statements, (First Aid), and complete Directions for Use

EPA Reg. No. 363-14  
EPA Est. No. 363-PA-001

Net contents \_\_\_\_\_ gallons

**Manufactured (by) (for):**  
Coopers Creek Chemical Corporation  
884 River Road  
West Conshohocken, PA 19428

<b>FIRST AID</b>	
If on skin or clothing	<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>
If swallowed	<ul style="list-style-type: none"> <li>• Call 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 induce vomiting unless told to by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<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 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOTLINE NUMBER</b>	
Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia.	

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid breathing vapors of heated material. Do not get in eyes, on skin, or on clothing. Wear protective eye wear (goggles, protective glasses or face shield). 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. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 mg/m<sup>3</sup> OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possible changes in liver, thyroid and blood elements.

See (side) (other) panel for additional precautions and First Aid.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety work boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

**USER SAFETY REQUIREMENTS**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

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.

Eating, drinking, and smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

**USER SAFETY RECOMMENDATIONS**

Users must:

- 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.

## ENVIRONMENTAL HAZARDS

This product is toxic to 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 Pollution 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.

## DIRECTIONS FOR USE RESTRICTED USE PESTICIDE

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

This product may only be used for terrestrial and aquatic non-food wood/wood structure protection treatments via pressure methods for utility poles/crossarms, railroad ties, switch ties, bridge timbers, agricultural fence and highway construction guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products for bridge and foundation construction only, and exterior structural composite glue laminated wood and plywood products for bridge and foundation construction only. Treated wood is intended for exterior/outdoor uses only. Do not use this product on wood intended for use in homes.

Use only dry wood. Unseasoned wood should first be steamed conditioned, followed by a 1 to 3 hour vacuum period by vapor drying. Normal retention required for creosote is from 6 to 12 pounds per cubic foot. Use an application rate of approximately 1 gallon per 100ft<sup>3</sup>.

## APPLICATION

**Engineering Controls to be put in place as of December 31, 2013:**

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

**General Instructions for Creosote Pressure Treatment:**

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

**The Treatment Process:**

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for

an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.

- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

For treated wood that will be used in marine or other aquatic or sensitive environments, a double vacuum must be used. Following the pressure period and once the creosote has been pumped back to the work tank, a vacuum shall be applied for a minimum of one and a half hours at not less than 22 inches of Hg (560 KPa) (adjusted for elevation) of vacuum to recover excess preservative. Then, depending on plant equipment: 1) vacuum for a minimum of one and a half hours at not less than 22 inches of Hg (560 KPa) (adjusted for elevation); or 2) steam material for one hour minimum and then pull not less than 22 inches of Hg (560 KPa) (adjusted for elevation) vacuum for a minimum of one and a half hours. Maximum temperature during steaming shall not exceed 240°F (115.5°C), as specified in the Best Management Practices (Aug. 2006) issued by the Western Wood Preservers Association, Southern Pressure Treaters' Association, Timber Piling Council, and Wood Preservation Canada.

#### **Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:**

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.

#### **STORAGE AND DISPOSAL**

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

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. A RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. 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.

Supplemental Labeling for Creosote (P2)  
EPA Reg. No. 363-14

Creosote (P2) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPA Book of Standards.

<b>AWPA Commodity Specification: Crossties and Switch Ties</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Crossties and Switch Ties, produced from all wood species recognized by AWPA for this commodity. Manufactured to meet AWPA specifications.

<b>AWPA Commodity Specification: Posts</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC4A	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>AWPA Commodity Specification: Poles</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue-or mechanically-laminated

<b>AWPA Commodity Specification: Piling</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 4C	Foundation and Land & Fresh Water Piles

<b>AWPA Commodity Specification Marine: (Salt Water/Brackish Water) Applications</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 5A, 5B, and 5C	Bulkhead sheathing Lumber/timbers use, including timbers, cross bracing, and highway construction Piles for marine applications Plywood for bridge and marine construction

<b>AWPA Commodity Specification: Sawn Products</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Cross arms Fence rail (farm/agricultural only, round, 1/4 round, 1/2 round)
UC4B	Highway bridge decking (above ground, structural, subject to critical/severe decay) Road salt/brine storage Highway construction materials, including cribbing, lighting Piles (structural support in residential or business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use Poles for structural building use Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures Lumber/ Timbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone)
UC4C	Piles for structural support



989

<b>AWPA Commodity Specification: Wood Composites</b>	
<b>AWPA Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B	Composite lumber for structural uses Glue- or nail-laminated structural members Plywood for agriculture, and farm use
UC 4A	PSL & LVL composite lumber for highway construction members (laminates) Plywood for bridge and farm/agricultural use
UC 4B	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: laminates can be glued or mechanically fastened

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber