

363-15

10-2-2002

4/5

OCT - 2 2002

Mr. William A. Connelly  
Vice President  
Coppers Creek Chemical Corporation  
West Conshohocken, PA 19428-2699

Subject: Black Creosote Coal Tar Solution  
EPA Registration Number 363-15  
Application Dated August 5, 2002

Dear Mr. Connelly:

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

**Proposed Amendment:**

- revised First Aid statement PR Notice 2001-1

**General Comments:**

The following label revisions must be made:

1. The Storage and Disposal text must read as follows:

**STORAGE AND DISPOSAL**

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

**PESTICIDE DISPOSAL:** Store in closed container in a cool, well ventilate area, If product is leaking or has been spilled, use an absorbent or sand and scrape up.

**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

SYMBOL	the nearest EPA Regional Office for guidance"				
SURNAME					
DATE					

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary land fill, or by other procedures approved by state and local authorities.

- 2. Delete the Personal Protection Equipment (PPE) from the pesticide disposal statement and add it to the label to read as follows:

**Personal Protective Equipment**

Applicators and other handlers must wear:

- Long sleeved shirt and long pants,
- Socks and shoes
- Goggles or face shield
- Chemical-resistant gloves (such as rubber or made out of water-proof material.)

- 3. Add the following statement to the label:

***User Safety Requirements and Recommendations***

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.

***"User Safety and Recommendations"***

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly.

3/5

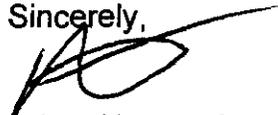
3

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.

Note: When submitting final printed labeling, make sure that the ink is completely dried so that it does not stick together, which make it impossible for microfiche.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Drusilla Copeland at (703) 308-6224.

Sincerely,



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

Enclosure

**RESTRICTED USE PESTICIDE**  
 (Due to chronic toxicity in animal studies)  
 retail sale to and use only for by certified applicators or by  
 persons under their direct supervision and only for those uses  
 covered by the certified applicators' certification.

**GROUND LINE TREATMENT OF UTILITY POLES  
 FOR PRESSURE TREATMENT OF WOOD  
 FOR USE IN NON-PRESSURE TREATMENT  
 SINCE 1915**

# THE C-4 BRAND COOPERSOTE CREOSOTE OIL

**PRESERVES AND LENGTHENS LIFE OF WOOD  
 STAINS A RICH CHESTNUT BROWN COLOR**

ACTIVE INGREDIENT:	Creosote (25004) AWP A P1/P13	98.5%
OTHER INGREDIENTS:	Water (Maximum)	1.5%
	Total	100.0%

**KEEP OUT OF REACH OF CHILDREN  
 DANGER!  
 FIRST AID**

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>
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> <li>For mild skin exposure, gently wipe skin with Mazola Corn Oil or waterless hand cleaner.</li> <li>Rinse skin immediately with plenty of water for 10 minutes.</li> <li>Hydrocortisone cream may be used for relief of skin irritation.</li> <li>Call doctor if irritation persists.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If a 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>
If swallowed	<ul style="list-style-type: none"> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>Do not give any liquid to the person.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<p><b>NOTICE TO PHYSICIAN</b>          Creosote (Creosote)-vomiting may cause aspiration pneumonia.</p>	

See Panel For Additional Precautionary Information Under Heading  
 "Precautionary Statements: Hazards to Humans and Domestic Animals"  
**5 GALLONS U.S. MEASURE**

**ENVIRONMENTAL HAZARDS**  
 This product is toxic to fish. 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. Do not contaminate water by cleaning of equipment or disposal of wastes.

**PHYSICAL AND CHEMICAL HAZARDS**  
 Do not use or store near heat or open flame. Close containers after each use. Creosote has a biting odor. Do not use where odor may penetrate to cause an odor problem. For outside or exterior use only.

**DIRECTIONS FOR USE**  
 Apply this product only as specified on this label. It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

**RESTRICTED USE CLASSIFICATION**  
 This product is a ready-to-use lime-treated creosote for use in non-pressure wood applications, groundline treatment of utility poles and the pressure treatment of wood. Protects wood that is used for non-domestic use, such as poles, pilings, fence posts, fences and foundation timbers.

**APPLICATION**  
**FOR PRESSURE TREATMENT:** Use only dry wood. Unseasoned wood should first be steam conditioned, followed by a 1 to 3 hour vacuum period, by vapor drying, or by kilndrying where wood is heated in creosote while under vacuum. Normal retention required for creosote is from 6 to 12 pounds per cubic foot. **FOR NON-PRESSURE TREATMENT:** Wood to be treated must be dry seasoned, and peeled of bark. Dip fence posts for 12 to 48 hours. Apply two heavy coats by brush (75-100 sq. ft. per gallon) allowing 24 hours between applications. **TREATMENT OF UTILITY POLES:** Apply at 60°F or more to clean and dry wood. For standing poles, dig a trench around the pole to a depth of 12 inches to 18 inches. Scrape away dirt and decayed wood. Apply a heavy coat with brush from the bottom of the trench to a height of 2 to 12 inches above the groundline. Coverage is 75-100 sq. ft. per gallon.

**COVERAGE**  
 Approximately 100 square feet per gallon.

**STORAGE**  
 Store in closed containers in a cool, well ventilated area. Wear protective neoprene rubber gloves, chemical safety goggles and protective clothing before opening and applying. Avoid contact with skin. If product is leaking or has been spilled, use an absorbent or sand and scrape up. Dispose of in an approved chemical disposal facility. Do not use or store near heat or open flame. Close containers after each use. Not for use or storage in or around the home.

**DISPOSAL**  
 Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are toxic. 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.

Do not reuse empty container. Puncture and dispose of in a sanitary landfill, or by other procedures approved by State and Local authorities. For household/domestic products: Securely wrap original pesticide containers in several layers of newspaper and discard in the trash. Do not reuse empty containers.  
 Wood which has been treated with this product should be disposed of by burial or ordinary trash collection. Do not burn treated wood in an outdoor fire or in stoves or fireplaces because toxic chemicals may be produced as part of the smoke and ashes.

**NOTICE**  
 This product is offered in good faith, however, the seller is not responsible for damages of any kind caused by careless or improper handling or use.

**PRECAUTIONARY STATEMENTS  
 HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**DANGER!**  
 MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN. CAUSES SKIN AND EYE IRRITATION. MAY CAUSE SEVERE BURNS. DO NOT GET IN EYES, ON SKIN OR ON CLOTHING. DO NOT BREATHE VAPORS OR SPRAY MIST. USE WITH ADEQUATE VENTILATION. DO NOT TAKE INTERNALLY. WASH THOROUGHLY AFTER SKIN CONTACT, BEFORE EATING, DRINKING, USE OF TOBACCO PRODUCTS, OR USING RESTROOMS. WEAR GOGGLES OR FACE SHIELD WHEN HANDLING.

**GENERAL PRECAUTIONS**  
 Avoid inhaling vapors. Inhalation of vapors cannot be avoided, applicators must wear a properly fitting well-maintained full-mask canister or cartridge respirator which is MSHA/NIOSH approved for polynuclear aromatics and organic vapors.  
 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 any general landfill, in the trash, or in any other manner approved for pesticide disposal.  
 Applicators must wear gloves impervious to the wood treatment formulation (e.g. polyvinyl acetate (PVA), polyvinyl chloride (PVC), or neoprene). In all situations where dermal contact is expected (e.g., during the actual application process and when handling freshly treated wood).

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.  
 Wash thoroughly after skin contact, and before eating, drinking, use of tobacco products, or using restrooms.

Under the Federal Insecticide, Fungicide, and Rodenticide Act amended, for this pesticide, registered with EPA Reg. No. 363-15  
 OCT - 2 2003  
 Accepted with comments EPA Letter Dated:

4/5

**C. CONTAINMENT TANK FOUNDATION:**

1. The containment tank foundation shall be solidly constructed of a material sufficiently impervious to contain leaks, spills and accumulated pesticides and/or rinsate of pesticides;
2. The foundation covering must be free of cracks which would allow leakage;
3. The foundation must be sloped to facilitate cleanup of inadvertent spills;
4. The foundation must be constructed with a rim of sufficient height to contain run-off from cleanup activities or inadvertent spills and be protected from flood waters;
5. The foundation must be so constructed as to discharge all liquids into a sump for reuse; and
6. Wood preserving operations will provide spill containment or control for product (or chemical) storage and work tanks such that at minimum 110% of the volume of the largest tank together with the volumes of the other potential spills will be contained in the event of a worst case rupture of other malfunction.

**I. CLOSED PESTICIDE APPLICATION CONTAINMENT SYSTEM REQUIREMENTS FOR DRIP PAD AND ASSOCIATED UNIT MANAGEMENT**

1. Drip pad systems must meet the following requirements:
  - A. Drip pad systems must be constructed of a curbed and/or sloped base having impermeable construction capable of containing drippage and accumulated precipitation while routed to an associated collection area or device (system);
  - B. Drip pad systems must be maintained such that they prevent preservative from leaking from the drip pad;
  - C. The drip pad and associated collection system must be designed and operated to collect and drain liquid resulting from drippage or precipitation in order to prevent run-off; and must be designed and maintained so as to be capable of containing precipitation from a 25-year/24-hour storm event if exposed to rainfall;
  - D. Run-on onto the drip pad and associated collection system must be prevented unless the system has sufficient excess capacity to contain any run-on that might enter the system;
  - E. Drippage and accumulated precipitation must be removed from the containment system as necessary to prevent overflow from the drip pad and associated collection system; and
  - F. If the owner or operator detects a condition that could lead to a release of preservative, the condition must be repaired within a reasonably prompt period of time following discovery or the pad must be removed from service.

**B. General Operating Requirement:**

Drip pads must be operated and maintained in a manner to minimize incidental tracking of preservative or preservative constituents off the drip pad by personnel or equipment.

**C. Inspections:**

Drip pad systems must be inspected thoroughly for visual signs of ineffectiveness. Facility inspection programs must involve inspection of the entire drip pad system at least monthly.

**FOR EXTERIOR USE ONLY**

**R.O. OTHER REGULATED SUBSTANCES, LIQUID,  
N.O.S., 9, NA3082, PGIII (CREOSOTE)**

**FOR MARINE SHIPMENTS**

**R.O. ENVIRONMENTALLY HAZARDOUS SUBSTANCES  
LIQUID, 9, N.O.S. (CONTAINS CREOSOTE)  
UN3082 MARINE POLLUTANT**



**MARINE POLLUTANT**

Manufactured By:

**COOPERS CREEK CHEMICAL CORPORATION**

West Conshohocken, PA 19428

Phone 610-828-0375 for Questions

EPA Registration Number 363-15

EPA Establishment Number 363-PA-I

**PRECAUTIONS FOR GROUND LINE TREATMENT**

Applicators must wear long sleeved shirts, long pants, and an impermeable apron during the application and mixing processes and all situations where dermal contact is expected.

Work clothing must be changed when it shows signs of contamination. Launder work clothing separately from other household clothing. Dispose of worn-out work clothing and workshoes or boots in any general landfill, in the trash, or in any other manner approved for pesticide disposal.

**PRECAUTIONS FOR PRESSURE TREATMENT OF WOOD USE**

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

Individuals who manually open cylinder doors must wear gloves and a respirator. Individuals who enter pressure treatment cylinders and other related equipment that is contaminated with the wood treatment formulation (e.g., cylinders that are in operation or are not free of the treatment formulation) must wear protective clothing (including overalls, jacket, gloves and boots) impervious to the wood treatment formulation and a respirator.

Acceptable materials for protective clothing during application and handling of this product are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene and NBR (Buna-N). 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 (e.g., manually opening/closing cylinder doors, moving trams out of cylinder, mixing chemicals, and handling freshly treated wood).

**PRECAUTIONS FOR NON-PRESSURE TREATMENT OF WOOD USE**

Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (for example, during the actual application process and when handling freshly treated wood).

Spray applicators must wear protective clothing (including overalls, jacket, gloves, boots and head covering) impervious to the wood treatment formulation, and a respirator and goggles when spraying. Acceptable materials for protective clothing during application and handling of this product are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene and NBR (Buna-N).

Individuals who enter, clean or repair vats, tanks or other related equipment that is contaminated with the wood treatment formulation (e.g., tanks that are in operation or are not free of the treatment formulation) must wear protective clothing (including overalls, jacket, gloves and boots) impervious to the wood treatment formulation, and goggles and a respirator.

Applicators who apply creosote by other application processes (e.g., brush on) must wear disposable overalls or other suitable impermeable protective clothing.

**NOTE TO USER:** As used on this label, the term "respirator" means properly fitting, well-maintained, half-mask canister or cartridge respirators which are MSHA/NIOSH approved for polynuclear aromatics and organic vapors. Examples of acceptable materials for protective clothing (e.g., gloves, overalls, jackets, and boots) required during application and handling of creosote are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene and NBR (Buna-N).

**CANCER HAZARD**

This product contains creosote which may cause cancer of the skin, lungs, kidneys, or bladder. Risk depends on duration and level of exposure. Follow recommended hygiene practices to protect yourself. Product has a strong odor. Do not use where odor may penetrate. For outside or exterior use only.

**FOR EXTERIOR USE ONLY**

**MANAGEMENT**

A. Commercial applicators electing to install closed containment systems for pest cides classified as a hazardous waste upon disposal must have such systems completed and operational on or before December 31, 1992. Following this effective date, any commercial applicator who is certified or licensed after January 1, 1993 who elects to install a closed containment system for pesticides classified as hazardous waste upon disposal, must have such system completed and operational before the issuance of the certification or license (to be modified to reflect individual applicator licensing not facility licensing).

**B. CONTAINMENT TANKS:**

1. Different containment tanks must be installed for different pesticides and/or rinsate of pesticides, except the same containment tanks may be used for two or more pesticides when such pesticides are physically and chemically compatible and when their mixing is not prohibited by their labels.

2. (i) General Requirements: Storage containers and tanks shall be constructed so as to prevent the discharge of liquid bulk pesticide. Storage containers and appurtenances shall be constructed of materials which are resistant to corrosion, puncture or cracking. Materials used in the construction or repair of storage containers and appurtenances may not be a type which reacts chemically or electrolytically with stored bulk pesticide in a way which may weaken the storage container or appurtenance, create a risk of discharge, or adulterate the pesticide. Metals used for valves, fittings and repairs on metal containers shall be compatible with metals used in the construction of the storage container, so that the combination of the metals does not cause or increase corrosion which may weaken the storage container or its appurtenances, or create a risk of discharge. Storage containers and appurtenances shall be designed to handle all operating stresses, taking into account static head, pressure buildup from pumps and compressors, and any other mechanical stresses to which the storage containers and appurtenances may be subject in the foreseeable course of operations.

(ii) Appurtenances: Every storage container connection, except a safety relief connection, shall be equipped with a shutoff valve located on the storage container or at a distance from the storage container dictated by standard engineering practice. Except for a storage container of mini-bulk pesticide, all wetted parts inside shutoff valves, and all connections from the storage container to the shutoff valve, shall be made of material(s) compatible with the pesticide. Valves shall be secured to protect against vandalism or accidental valve openings which may result in a discharge. Pipes and fittings shall be adequately supported to prevent sagging and possible breakage because of gravity and other forces which may be encountered in the ordinary course of operations.