

748-277

9-19-2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 19 2000

Cristina Griffin, Agent for
PPG Industries, Inc.
c/o Delta Analytical Corp.
7910 Woodmont Avenue, Suit #1000
Bethesda, MD 20814

Dear Ms. Griffin:

Subject: Revised Labeling - Incorporate Changes Required By IPBC RED
PLT@ 77 Ready To Use
EPA Registration No. 748-277
Amendment application of February 5, 1998

The Agency has completed its review of the "8 month responses of the IPBC RED" and concluded that the data (acute toxicity, efficacy and product chemistry) is acceptable. However, the labeling is not acceptable for reregistration at this time. The following labeling revisions must be made:

1. Add the following statement directly below the ingredients statement
"Contains Petroleum Distillate"
2. The Signal Word must be changed from "CAUTION" to "WARNING" wherever it appears on the label.
3. Revise the Precautionary Statements to read:

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

WARNING: Causes skin irritation. Harmful if adsorbed through skin. Causes moderate eye irritation. Do not get on skin or on clothing. Avoid contact with eyes. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Remove contaminated clothing and wash clothing before reuse.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

4. Change the heading "STATEMENT OF PRACTICAL TREATMENT" to "FIRST AID" and revise to first aid statement to read:

"FIRST AID

IF ON SKIN: 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 rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center or doctor for treatment advice.

5. This product is a Category IV for Acute Oral Toxicity and Acute Inhalation. Although First Aid statements are not required for these routes of exposure, you have the option to use the following statements:

IF SWALLOWED: Call a poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told by a Poison Control Center or doctor.

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.

6. The First Aid statements should be in a box and include the following statements and information near the First Aid Statement described above:

"In case of emergency call toll free contact Chemtrec a 800-424-9300"

"Have the product container or label with you when calling a Poison Control Center or doctor.

7. Revise the Personal Protection Equipment (PPE) statement to read as stated in Appendix I Enclosure for PPE. Note that although protection eyewear is not required based on the acute data results of this product, you have the option of keeping it on the labeling.

See Appendix II.

8. Refer to Appendix II for additional "User Safety Requirements" that may be included in the statement.

9. Add the following statement under the "STORAGE AND DISPOSAL" heading.

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

A stamped copy is enclosed for your records. Please submit five (5) copies of the final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

EPA has determined that you have fulfilled the labeling and product specific data requirements of the IPBC RED. However, we cannot reregister this product at this time. This product is registered for use on wood protection uses, a use for which the Agency does not have sufficient information to make a reregistration eligibility decision. Once the required data [exposure data], have been reviewed by the Agency, EPA will make a reregistration eligibility decision for the wood protection use.

If you have any questions concerning this letter, please contact Portia Jenkins at (703) 308-6230.

Sincerely yours,



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

Enclosure

PILT®-77 READY TO USE

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KEEP OUT OF REACH OF CHILDREN

CAUTION

WOOD PRESERVATIVE - FOR INDUSTRIAL USE ONLY
PRESERVES AND PROTECTS WOOD FROM ROT AND MILDEW

Active Ingredient:		
3-iodo-2-propynyl butylcarbamate	0.50%
Inert Ingredients:	<u>99.50%</u>
Total	100.00%

STATEMENT OF PRACTICAL TREATMENT

- IF ON SKIN: This product is a strong dermal sensitizing agent; therefore, people with skin allergies should avoid contact. Wash with plenty of soap and water. Get medical attention if irritation persists.
- IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.
- IF SWALLOWED: Do not induce vomiting. Promptly drink a large quantity of milk, egg whites or gelatin solution. If these are not available, drink large quantities of water. Avoid alcohol. Get immediate medical attention.
- IF INHALED: Remove to fresh air. If breathing has stopped, give artificial respiration, preferably mouth to mouth. Get immediate medical attention.

See back panel for additional precautionary statements.

Manufactured by: PPG Industries, Inc.
One PPG Place
Pittsburgh, PA 15272

ACCEPTED
with COMMENTS
in EPA Letter Dated:
SEP 19 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 748-277

EPA REG. NO. 748-277
EPA EST. NO. 748-WI-1 or 748-GA-1

NET CONTENTS: _____ GALLONS
_____ LBS./GALLON

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: CONTAINS PETROLEUM DISTILLATES. Use only with adequate ventilation. Avoid prolonged breathing of vapors or spray mist. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Applicators and other handlers (including handlers of freshly treated lumber) must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves such as barrier laminate, nitrile rubber, neoprene rubber, or viton
- Protective eyewear
- Shoes plus socks.

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 Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters. 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.

CHEMICAL AND PHYSICAL HAZARDS

Flammable. Keep away from heat and open flame.

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Fungicide, and Rodenticide Act as
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DIRT TIONS FOR USE: PILT®-77 READY TO USE

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It is a violation of federal law to use this product in a manner inconsistent with its labeling. For industrial use only. Must be applied to unpainted, clean, dry wood.

Do not apply this product in a way that will contact workers or other persons.

PILT®-77 READY TO USE protects against decay producing fungi, staining fungi and surface mold.

PRODUCT USES: This product is recommended for millwork, shingles (not asbestos), shakes, clapboards, smooth or rough-cut siding, plywood, decks, porches, railings, structural support timbers, flatbeds, coldframes and greenhouses. (Do not use for below or ground contact applications requiring preservative qualities. Do not use on wood that will be used in contact with food, feed or potable water or where prolonged skin contact will occur. Due to the presence of petroleum distillates in this product, do not use on lumber that can be used where dairy cattle or livestock can come in contact with the treated wood.)

PILT®-77 READY TO USE is ready to use as is. Immerse individual wooden parts by either flowcoating or dipping. Allow the wooden parts to dwell in the flowcoater or dip tank in contact with **PILT®-77 READY TO USE** a minimum of 15 seconds. Bundles of parts should be immersed for 3 minutes. Remove from solution and, prior to painting, allow the wood to dry at 65°-75°F in an area with engineered ventilation. Use hydrocarbon solvent for clean-up solvent.

STORAGE AND DISPOSAL

STORAGE: Do not store near heat sources or open flame.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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

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