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MAY 14 1986

Universal Cooperatives
7801 Metro Parkway
Minneapolis, MN 55440

Attention: Bert Atsma

Gentlemen:


Subject: Penta Concentrate
EPA Registration No. 1386-30
Your Application Dated September 10, 1985

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to comment listed below. Five copies of the finished labeling must be submitted at the next printing.

- Add "Do not apply where runoff is likely to occur" to the Environmental Hazards section.

A stamped copy of the label is enclosed for your records.

Sincerely yours,


Henry M. Jacoby
Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosure

888941NOLEB1J-1:KENC013/20/86-1/21/86:DAA

SYMBOL ▶								
SURNAME ▶								
DATE ▶								

RESTRICTED USE PESTICIDE

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.

Penta
Concentrate

**KEEP OUT OF REACH OF CHILDREN
DANGER**

See Side Panel For Additional Precautionary Statements

ACTIVE INGREDIENTS:

Pentachlorophenol*	35.26%
Other chlorophenols and related compounds ..	4.10%
Petroleum hydrocarbons ..	41.00%
INERT INGREDIENTS ..	19.64%
Total ..	100.00%

* CONTAINS 41% TECHNICAL PENTACHLOROPHENOL AS DEFINED IN FEDERAL SPECIFICATION TT-W-570.

NET VOLUME: 1 Gallon
Product 501

EPA Reg. No. 1386-30
EPA Est. No. 1386-III-1

CO-OP

UNIVERSAL COOPERATIVES, INC., MINNEAPOLIS, MI 55440

ACCEPTED
with COMMENT
to EPA Letter

MAY 14 19

Under the Fungicide, and
as amended, for the
registered under EPA

1386-3

504-7

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING

Harmful if swallowed or absorbed through skin. Causes eye and skin irritation. Do not get in eyes, on skin, or on clothing. Avoid inhaling vapors or spray mist. If inhalation of vapors or spray mist cannot be avoided, applicators must wear a properly fitting, well-maintained half-mask cannister or cartridge respirator which is MSIA/NIOSH approved for organic vapors and acid gases.

The U.S. EPA has determined that pentachlorophenol can produce defects in the offspring of laboratory animals. Exposure to PENTA CONCENTRATE during pregnancy should be avoided.

Applicators must wear gloves impervious to this product 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, jackets, gloves and boots) impervious to this product and a respirator, head covering, and goggles when spraying.

When applied by the spray method of application in nonpressure treatment plants, spray apparatus must (1) be operated so as to minimize overspray (i.e., no visible mist) and (2) be free of leaks in the system. Should there be a visible mist, spray applicators in the vicinity of the apparatus (the zone in which the mist is visible) must wear a respirator and protective clothing (including overalls, jackets, boots, head covering impervious to the wood treatment formulation, and goggles). Individuals who enter, clean, or repair vats, tanks, or other related equipment that are contaminated with the treatment solution must wear a respirator. In addition, where dermal contact is expected, these individuals must wear overalls, jackets, boots, head covering impervious to the wood treatment formulation, and goggles.

Applicators who apply this product by other application methods (e.g., brush-on) must wear disposable coveralls or other suitable impermeable protective clothing. Launder nondisposable protective clothing separately from other clothing.

Applicators must not eat, drink, or use tobacco products during those parts of the application process that may expose them to this product.

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

Protective clothing must be changed when it shows signs of contamination. Farm and home applicators may dispose of worn-out protective clothing and workshoes or boots in any general landfill, in the trash, or in any other manner approved for pesticide disposal.

Nonpressure treatment plant applicators must leave all protective clothing, 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.

STATEMENT OF PRACTICAL TREATMENT

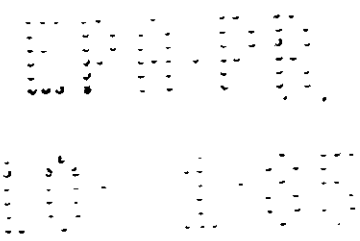
If swallowed: Give 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Call a physician. If on skin: Wash with soap and water. Remove and wash contaminated clothing before reuse. If in eyes: Immediately flood with water for at least 15 minutes. Call a physician. If inhaled: Remove victim to fresh air. Apply respiration if indicated.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.



DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. READ ENTIRE LABEL BEFORE USING THIS PRODUCT.

GENERAL INFORMATION AND USE RESTRICTIONS

Penta Concentrate is a clean petroleum oil solution containing 41% of technical pentachlorophenol to be used to protect wood against dry rot and mildew which cause decay and stains, termites (both as a wood preservative prior to construction and as a soil treatment) and powder post beetles.
Before using mix or dilute one part of Penta Concentrate with ten parts by volume of a suitable petroleum solvent such as naphtha, kerosene, light fuel oil, mineral spirits, range oil, or petroleum equivalent.

Do not apply where there may be direct contact with domestic animals or livestock, and where there may be contamination of food, feed, or drinking and irrigation water.

Do not apply in interiors (except for wood treatment plant operations). Do not apply to wood intended for use in interiors except for those support structures which are in contact with the soil in barns, stables, and similar sites and which are subject to decay or insect infestation, and millwork which has outdoor surfaces (e.g., doorframes, windows, and patio frames). Interior surfaces of the treated wood should be sealed with two coats of an appropriate sealer.

Do not apply to logs which are intended for use in the construction of log homes.

Do not apply this product to wood intended for farrowing or brooding facilities. Do not apply to wood intended to be used in the interiors of farm buildings where there may be direct contact with domestic animals or livestock which may crib (bite) or lick the wood. This product may be used to treat wood intended to be used in interiors of farm buildings where domestic animals or livestock are unlikely to crib or lick the wood, if two coats of an appropriate sealer will be applied.

Do not apply to wood intended to be used in a manner in which the preservative may become a component of food or animal feed. Examples of such sites would be structures or containers for storing silage or food.

Do not use this product to treat wood intended to be used for cutting-boards or counter-tops.

Do not use this product to treat wood intended for construction of those portions of beehives which may come into contact with the honey.

Do not use this product to treat wood intended to be used where it may come into direct or indirect contact with public drinking water or with drinking water for domestic animals or livestock, except for those uses involving incidental contact such as docks and bridges.

Do not use this product to treat wood intended to be used where it may come into direct or indirect contact with drinking water for domestic animals or livestock, except for uses involving incidental contact such as docks and bridges.

Wood to be treated with this product should be cut to size before treatment. If it is necessary to saw or machine wood after treatment, wear goggles to protect the eyes from flying particles and a dust mask to avoid inhaling sawdust from the treated wood. If oily preservatives or sawdust accumulate on clothes, launder before reuse. Wash work clothes separately from other household laundry.

Contact with treated surfaces should be avoided even after the preservative has dried. When handling treated wood wear tightly woven coveralls and gloves which are impervious (e.g., vinyl coated) to the pesticide. Wash exposed skin thoroughly after contact with treated wood, and before eating, drinking, or using tobacco products.

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.

This product should not be used to treat wood which will be in frequent or prolonged contact with skin, unless the wood will be treated with an effective sealer.

NOTE TO USER: As used on this label, the term "respirators" means properly fitting, well-maintained half-mask canister or cartridge respirators which are MSHA/NIOSH approved for organic vapors and acid gases. Examples of acceptable materials for protective clothing (e.g., overalls, jackets, head covering, boots, disposable coveralls, and gloves) required during application and handling of pentachlorophenol are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, NBR (Buna-R), and nitrile. In addition, plastic coated disposable coveralls impervious to dust are acceptable for dust protection. Urethane, shellac, latex epoxy enamel and varnish are acceptable sealers for pentachlorophenol treated wood.

Do not allow the neat solution or spray to contact desirable or beneficial plants. Do not apply to or use treated wood for fruit and vegetable containers, plant stakes, flats, holed frames, and greenhouse benches.

APPLICATIONS

FENCE POSTS AND POLES: Posts or poles should be peeled or barked and seasoned until dry. Soak posts and poles in the diluted penta solution for 48 hours, preferably in a vertical position with large end downward.

MILL WORK: To protect windows, doors, screens, door frames, window frames, and tool handles, give the unpainted lumber a 3-minute dip, or two thorough brushings or sprayings with the diluted penta solution.

FLOORS, SUB-FLOORS, SILLS, STUDDING JOISTS OR OTHER BUILDING SUPPORTS: Dip or spray unpainted lumber with the diluted penta solution before construction. If this is impossible, spray, scrub or brush both interior and exterior, particularly all joints and sills, with two liberal coats of the diluted penta solution. Allow 7 or 3 days for each to dry. If wood is immersed, treat five minutes per inch of thickness. If treated wood is to be painted, use clear, clean naptha or mineral spirits for the dilution of Penta Concentrate. Wood intended for use in contact with the ground should receive at least two heavy brush coats if such wood cannot be dipped.

NOTE: All wood should be normally dry before treating. Estimated coverage: 5 to 10 gallons per 1,000 board feet for open tank treating; 200 square feet per gallon for brush or spray application. Do not paint or varnish wood that has been treated for at least 10 days.

TO CONTROL POWDER POST BEETLES: Spray the diluted penta solution directly on infested wood, using a compressed air sprayer, and holding the nozzle about 3 inches from the surface being treated. A brush may be used to apply the penta solution to small areas. Apply thoroughly, wetting all surfaces with two spray applications by the cat. One gallon of the diluted penta solution will cover about 250 square feet of rough surface or 400 square feet of finished surfaces.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Do not store near heat or open flame. Do not store inside the home. Store product in original container.

FOR HOUSEHOLD/DOMESTIC APPLICATORS

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Container Disposal: Do not reuse empty can. Wrap can and put in trash.

FOR ALL OTHER APPLICATORS

Pesticide 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.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by State and local authorities.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty, including any other express or implied warranty of fitness or of Merchantability, and no agent of Seller is authorized to do so except in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.