

Reg. # 3008-13

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MAR 27 1986

Osmose Wood Preserving, Inc.
980 Ellicott Street
Buffalo, NY 14209

Attention: Gerald L. Daugherty

Gentlemen:

Subject: Osmoplastic, EPA Registration No. 3008-4
Osmosalts, EPA Registration No. 3008-7
Osmoplastic-F, EPA Registration No. 3008-13
Osmoband, EPA Registration No. 3008-14
Osmoplastic-B, EPA Registration No. 3008-15
Osmose K-33 (72%), EPA Registration No. 3008-16
Osmose K-33-C (72%), EPA Registration No. 3008-17
Pole Topper Fluid, EPA Registration No. 3008-19
Special K-33 Preservative, EPA Registration No. 3008-21
PCP 1-10 Concentrate, EPA Registration No. 3008-25
24-12, EPA Registration No. 3008-28
10% PCP TUR Solution, EPA Registration No. 3008-30
Osmose K-33 (60%), EPA Registration No. 3008-34
Osmose K-33-C (50%), EPA Registration No. 3008-36
Osmopenta, EPA Registration No. 3008-37
Osmose K-33-A (50%), EPA Registration No. 3008-42
PCP 5% RTU Solution, EPA Registration No. 3008-45
Osmotox-Plus, EPA Registration No. 3008-48
Your Application Submission Dated February 13, 1986

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act FIFRA, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted before you release the product for shipment.

1. Insert a "Physical and Chemical Hazards" heading and applicable statements immediately following the environmental hazards section on those labels lacking such information.
2. Change the hazard warning word from "Warning" to "Danger" on applicable labels.

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3. Rephrase all environmental hazard statements to read " This product is toxic to fish and wildlife. Do not apply directly to water. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment or disposal of wastes."
4. The label for EPA Registration No. 3008-8 will not be approved because of the product's previous cancellation in 1975. If you desire to market this product, you must apply for a new registration.
5. The distribution label for EPA Registration No. 10771-2-3008 also will not be approved. The registrant (EPA Company Number 10771) is responsible for all pesticide label matters under FIFRA.
6. Only one stamped approved label will be issued per EPA Registration Number. Your submissions include two labels for EPA Registration No. 3008-13 which carries two different product names with identical labeling. One stamped approved label will be applicable to all additional products or brand names carried under the registration.
7. The "total arsenic" and "water soluble arsenic as metallic" ingredient percentage claims must be transferred as a substatement to be below the ingredient statement on the label of EPA Registration No. 3008-34.
8. The net contents statement must be further clarified. The current contents indicate two figures. One figure (usually the top or beginning) presumably addresses the total contents. The second or last statement provides content information on specific contents (i.e., 166 lb Oxide Basic, minimum as indicated on the label of EPA Registration No. 3008-34). If this secondary content statement is actually part of the total contents, then enclose the statement in parentheses.
9. Resubmit revised Confidential Statements of Formula to indicate, under item 13a, the amounts in gal, lb, or lb/gal.

Submit five (5) copies of each of the revised labeling.

Sincerely yours,



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

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 27 1986

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

3008-13

DESCRIPTION:

ADZ-LIFE is a highly-toxic Wood Preserving Compound with superior penetration and retention characteristics for long-lasting preservation treatment of ties and timber. Its fluoride-pentachlorophenol combination of toxic ingredients is far in excess of the minimum amounts required to halt or prevent decay. Special inert ingredients assure ease of application... contribute to maximum penetration and retention.

DIRECTIONS FOR USE:

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

Machine application to ties — transfer **ADZ-LIFE™** from containers to hopper of application machine. Adjust machine to apply 4 cubic inches of **ADZ-LIFE** to each tie plate area (9 cu. in. per tie). Treated area should be completely covered by tie-plate.

Application to other timber — Remove all surface decay. Apply **ADZ-LIFE** to surface to be treated with paint or window brush, making liberal application to checks and splits. Apply material at a thickness of 1/8 in.

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 coveralls, jacket, gloves, boots and head covering) impervious to the wood treatment formulation, and a respirator and goggles when spraying.

Applicators who apply pentachlorophenol by other application methods (e.g., brush-on) must wear long-sleeved shirts, long pants, and an impervious apron. Launder protective clothing separately from other household laundry.

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. Protective clothing must be changed when it shows signs of contamination.

Dispose of worn-out protective clothing and respirators or boots in any general landfill in the trash, or in any other manner approved for pesticide disposal.

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 toxic. Improper disposal of excess pesticide, spray mixture, or residue 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: Completely empty bag. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

RESTRICTED USE PESTICIDE

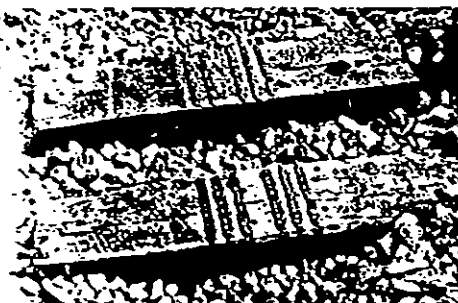
For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

FOR PRESERVATIVE TREATMENT OF RAILROAD TIES & OTHER TIMBER

ADZ-LIFE™

WOOD PRESERVING COMPOUND

KILLS EXISTING DECAY — INHIBITS NEW FUNGUS GROWTH



ACTIVE INGREDIENTS	
Sodium Fluoride	20.0%
Pentachlorophenol*	8.6%
Other chlorophenols and related compounds*	1.1%
Creosote	18.0%
INERT INGREDIENTS	55.0%
TOTAL	100.0%

CONTAINS PETROLEUM DISTILLATES

WARNING

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

KEEP OUT OF REACH OF CHILDREN

STATEMENT OF PRACTICAL TREATMENT

If on skin, wash with plenty of soap and water. Get medical attention.

If swallowed, do not cause vomiting. Call a physician immediately.

If inhaled, remove victim to fresh air. Give artificial respiration or oxygen if needed. Get medical attention.

If in eyes, flush with plenty of water for 15 minutes. Get medical attention.

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS
EPA REG. NO. 3008-13 EPA EST. NO. 3008-NY-1

OSMOSE WOOD PRESERVING CO. OF AMERICA, INC. — BUFFALO, N.Y. 14203

PRECAUTIONARY STATEMENT HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

CONTAINS PETROLEUM DISTILLATES

Avoid inhaling vapors. If inhalation of vapors cannot be avoided, applicators must wear a properly fitting, well-maintained half-mask canister or cartridge respirator which is MSHA/NIOSH-approved for organic vapors and acid gases.

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. 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. Sealers may be applied at the installation site.

Do not apply pentachlorophenol to wood intended for farrowing or brooding facilities.

Do not apply pentachlorophenol 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.

Pentachlorophenol 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. Sealers may be applied at the installation site.

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 feed.

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, 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 only 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 long-sleeved shirts, long pants and impervious gloves (e.g., vinyl coated). 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 fire places 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 fitted, well-maintained half-mask, canister or cartridge respirators which are MSHA/NIOSH-approved for organic vapors and acid gases. Examples of acceptable impervious materials for protective clothing (e.g., coveralls, jacket, head covering, boots, and gloves) required during application and handling of pentachlorophenol are polyvinyl acetate (PVAc), polyvinyl chloride (PVC), neoprene, NBR (butadiene), and nitrile. Urethane, shellac, latex, epoxy enamel and varnish are acceptable sealers for pentachlorophenol-treated wood.

PHYSICAL AND CHEMICAL HAZARDS

COMBUSTIBLE. Do not use near heat or open flame. In case of fire, use water spray, foam, CO₂, or dry chemical. Plants or shrubs should be removed within 3 feet of treatment or protected with tar paper. Treated sawdust and other wood waste should not come in contact with domestic animals or be used so that they come in contact with useful living plants.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.