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MAR 27 1986

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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-P, 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)

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

WARNING: May be fatal if swallowed, inhaled or absorbed through the skin. Causes eye and skin irritation. Do not breathe vapors or spray mist. Use only with adequate ventilation. Do not get in eyes, on skin, or on clothing. Wash thoroughly after handling and before eating or smoking. Wear protective clothing and rubber gloves when handling freshly treated lumber.

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 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, 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 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 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.

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.

PCP
5% RTU SOLUTION

WOOD PRESERVATIVE

For Prevention and Control of Fungal Decay in Wood

ACTIVE INGREDIENTS:	
Pentachlorophenol ¹	4.30%
Other Chlorinated Phenol and Related Compounds	0.50%
INERT INGREDIENTS	95.20%
	100.00%

¹Equivalent to 5.00% Technical Pentachlorophenol as determined by Federal Specification TTW-570.

**KEEP OUT OF REACH OF CHILDREN
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.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Induce vomiting by touching the back of the throat with finger. This product contains petroleum distillates, avoid aspiration of vomit. Do not induce vomiting of an unconscious person. Call a physician immediately.
IF INHALED: Remove victim to fresh air. Apply respiration if indicated. Call a physician immediately.
IF ON SKIN: Remove contaminated clothing and wash affected area with soap and water.
IF IN EYES: Flush eyes with plenty of water. Call a physician immediately.
SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

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 impervious materials for protective clothing (e.g., overalls, jackets, head covering, boots, and gloves) required during application and handling of pentachlorophenol are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, NBR (Buna-N), and nitrile. Urethane, shellac, latex epoxy enamel and varnish are acceptable sealers for pentachlorophenol-treated wood.

EPA Est. 3008-NY-1 EPA Registration No. 3008-46
OSMOSE WOOD PRESERVING CO. OF AMERICA, INC.
BUFFALO, NY 14201
NET CONTENTS 12 OZ. AV.

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

MAR 27 1986

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended by the pesticide registration act of EPA Reg. No.

3008-45

ENVIRONMENT

This product is toxic to fish and wild streams or ponds. Do not contaminate disposal of wastes.

PHYSICAL OR CHEMICAL

Do not use, pour, spill or store near heat.

DIRECTIONS

It is a violation of Federal law to use this product with its labeling.

This material may be used for treatment of total immersion or pressure treatment of fungal decay organisms.

Previously untreated fence posts, pilings, wooden members should be free of wood preservative.

In re-treating previously treated utility poles, saturation along the full length of the pole is required. Osmoplastic at the groundline area where

Applicators must wear gloves, boots and goggles. This material is impervious to the wood treatment formulation in all situations. Dermal contact is expected during the actual application and when handling freshly treated wood.

Spray applicators must wear protective clothing (including jackets, gloves, boots and goggles) covering impervious to the treatment formulation, and goggles when spraying.

Applicators who apply pentachlorophenol by other methods (e.g., brush-on) must wear long pants, a impermeable apron. Launder clothing separately from other household laundry.

Applicators must not eat, drink, or use tobacco products during the application process that may result in contact with them to the wood treatment.

Wash thoroughly after skin contact and before eating, drinking, or using tobacco products, or using protective clothing must be washed when it shows signs of contact.

Dispose of worn-out protective clothing and workshoes or boots in a landfill in the trash, or in a manner approved for pesticides.

STORAGE AND DISPOSAL

STORAGE: Do not store in food or feed by storage or disposal is prohibited. Do not dump.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mix, or empty containers is a violation of Federal law. Pesticide wastes cannot be disposed of in a landfill in the trash, or in a manner approved for pesticides.

CONTAINER DISPOSAL: Recycle if possible. If not, recycle, reuse, or dispose of by other appropriate local procedures.