



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

NOV - 6 2002

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Teri Muchow
Regulatory Specialist
Osmose, Inc.
980 Ellicott Street
Buffalo, NY 14209

Subject: **Pole Wrap™**
EPA Registration No. 3008-52
Application Dated September 18, 2002

Dear Ms. Muchow:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with comments.

Proposed Amendment:

- Revised first aid statements per PR Notice 2001-1

General Comments

1. Revise the Personal Protective Equipment (PPE) language to read as follows:

Personal Protective Equipment

Applicators and other handlers must wear:

- coveralls, over long-sleeved shirt and long pants
 - socks and chemical resistant foot wear;
 - goggles or face shields,
 - chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, viton).
- For mixing/loading: Wear a chemical resistant apron.

2. The following User Safety Requirements and Recommendations must be added to the label:

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 must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly."

3. Revise Storage and Disposal section to read as follows:

Storage and Disposal

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

Pesticide Storage: Store in a cool place. Avoid excessive heat.

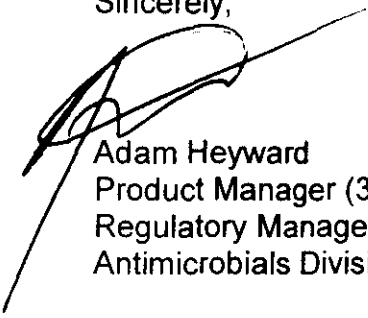
Pesticide Disposal: Wastes resulting ...facility

Container Disposal: Completely empty bag. Then...smoke

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



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

Enclosure

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS
AND DOMESTIC ANIMALS
DANGER:**

May be fatal if swallowed. Corrosive. Causes irreversible eye damage. Do not get in eyes. Wear protective eye wear (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling. Do not get in eyes, on skin, or on clothing
Remove contaminated clothing and wash clothing before reuse.

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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

STORAGE: Store in a cool place. Avoid excessive heat.
PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage and disposal. Wastes resulting from the use of this product may be disposed of on site, or at an approved waste disposal facility.
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.

Pole Wrap™

This product is for commercial purposes only. Not for household use.

PoleWrap™ is a supplemental treatment which aids in extending pole life. Designed specifically to protect the groundline portion of wooden poles, PoleWrap™ contains a recognized water soluble preservative used in the art of wood preservation for more than 40 years. This preservative penetrates deeply into the wood. PoleWrap™ offers protection against decay for a comparable period to your normal groundline treatment cycle, consistent with industry practice.

ACTIVE INGREDIENTS:
Sodium Fluoride..... 70.8%
INERT INGREDIENTS: 29.4%
Total 100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID

If inhaled	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.
If on skin or clothing	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 eye. Call a poison control center or doctor for treatment advice.
If swallowed	Call poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

DIRECTIONS FOR USE

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

Dig around the groundline of the pole to be treated to a depth of approximately 20 inches. Remove hardened creosote and rotted wood. Inspect pole as to remaining serviceability. Clean the surface of the pole to be treated. Measure the circumference of the pole. Cut from the roll of PoleWrap™ the length needed. Apply to the pole to the depth of approximately 18 inches below groundline, and 2 inches above groundline. Attach to pole by means of staples or tacks. Be sure bandage is pulled tight to be in close contact with the wood pole. Back fill and tamp the earth around the pole to 2 inches above the original groundline.

Proper use includes the covering of any exposed product above the groundline in areas where children or livestock may come in contact with it. Various products which can be used for this purpose are Osmose's Pasture Wrap or some other type of barrier which prevents the product from being easily removed and consumed. If you have any questions regarding this product, please contact Osmose at (716) 882-5905 and ask for the Product Manager in the Utilities Division.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

NOTE

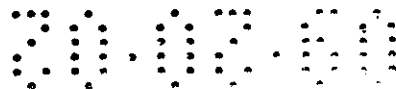
Seller makes no warranty, expressed or implied concerning this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

Minimum Weight..... 25 lbs.

Manufactured by:

Osmose®

Osmose, Inc.
980 Ellcott Street
Buffalo, NY 14209



ACCEPTED
with COMMENTS
EPA Letter Dated:

SEE INFORMATION PANELS FOR
PRECAUTIONARY STATEMENTS

EPA Est. No. 3008-NY-1

EPA Reg. NO. 3008-52

NOV - 6 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 3008-52

Osmose is a registered trademark of S-T-N Holdings, Inc.
Pole Wrap is a trademark of S-T-N Holdings, Inc.

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