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MAR 28 1986

W.M. Barr and Company, Inc.
P.O. Box 1879
Memphis, TN 38101

Attention: Ronald P. Riley, Sr.

Gentlemen:

Subject: Deep Treat 1-10 Concentrate
EPA Registration No. 4091-3
Seal Treat
EPA Registration No. 4091-4
Deep Treat RTU
EPA Registration No. 4091-5
Your Letter Dated February 25, 1986

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

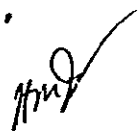
1. Change the environmental hazard statement "Do not apply directly to lakes, streams, or ponds" to "Do not apply directly to water." Also, add "Do not contaminate water by cleaning of equipment or disposal of wastes."
2. Add "The U.S. EPA has determined that pentachlorophenol can produce defects in the offspring of laboratory animals. Exposure to pentachlorophenol during pregnancy should be avoided" to the precautionary statements.
3. All applicable disposal statements must be grouped under the storage and disposal section within or immediately following the

88890;Notes:J-2;KEMCO:3/14/86;3/25/86;TAR:LISA

directions for use. Also, add applicable product storage information within this section.

Stamped copies of each label are enclosed for your records.

Sincerely yours,



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

Enclosures

RESTRICTED USE:

FOR SALE TO AND USE ONLY BY CERTIFIED APPLICATORS OR BY PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATORS' CERTIFICATION.

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 overalls, jackets, 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 impermeable 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 workshoes or boots in any general landfill in the trash, or in any other manner approved for pesticide disposal.

FOR PRODUCTS FOR FARM USE OR RAILROAD TIE REPAIR: 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.

FOR HOUSEHOLD/DOMESTIC USE PRODUCTS: Securely wrap original pesticide container in several layers of newspaper and discard in the trash. Do not reuse empty containers.

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 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.

(See other side panel for additional instructions and precautions.)

EPA Reg. No. 4091-5
EPA Est. 4091-TN-1

Deep-Treat

Penta Wood Preservative Restricted Use Pesticide

Ready-to-use



Stops rot

Kills termites

ACTIVE INGREDIENTS:

Pentachlorophenol 4.48%

Other chlorophenols .52%

Total Active 5.0%

INERT INGREDIENTS 95.0%

Total 100.0%

NET 5 GALLONS

KEEP OUT OF REACH

DANGER
HARMFUL OR FATAL IF
ABSORBED THROUGH SKIN
IRRITANT, COMBUSTIBLE.
Read precautions elsewhere

Klean-Strip

RESTRICTED USE (CONTINUED):

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.

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), and polyvinyl chloride (PVC), neoprene, NBR (Buna-N), and nitrile. Urethane, shellac, latex epoxy enamel and varnish are acceptable sealers for pentachlorophenol-treated wood.

Neither the manufacturer nor the seller makes any representation or warranty, expressed or implied, concerning this product except that it is of the manufacturer's standard quality. Neither shall be held responsible in any manner for any personal injury, property damage or other type of loss resulting from the improper handling, storage and use of this product. The buyer accepts and uses this product on these conditions.

Klean-Strip

Div. W. M. Barr, Inc.
Memphis, TN 38101 1970

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

DANGER! HARMFUL OR FATAL IF SWALLOWED OR ABSORBED THROUGH SKIN. SKIN AND EYE IRRITANT. CONTAINS PENTACHLOROPHENOL AND PETROLEUM DISTILLATES. DO NOT TAKE INTERNALLY. AVOID BREATHING OF VAPORS. USE ONLY IN A WELL VENTILATED AREA. DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING. WASH THOROUGHLY AFTER HANDLING. KEEP PRESERVATIVE AND FRESHLY TREATED WOOD AWAY FROM FLAME, FOODSTUFFS AND PLANTS. DO NOT REUSE CONTAINER. Close container after each use.

VAPORS WILL CAUSE INJURY IF ADEQUATE VENTILATION IS NOT INSURED. DO NOT USE THIS PRODUCT INDOORS OR IN ANY OTHER CONFINED AREAS WHERE THE VAPORS MAY CONCENTRATE AND CAUSE INJURY TO PLANT OR ANIMAL LIFE. AVOID CONTACT WITH GRASS, TREES OR SHRUBS DURING APPLICATION AS DAMAGE CAN OCCUR. WEAR RUBBER GLOVES AND PROTECTIVE CLOTHING WHEN HANDLING THE FRESHLY TREATED LUMBER.

NOT FOR INTERIOR USE NOR FOR USE ON WOOD INTENDED FOR INTERIOR USE. DO NOT TREAT WOOD INSIDE DAIRY BARN, SILOS OR OTHER STRUCTURES WHERE IT MAY CONTACT FOOD, FEED OR LIVESTOCK.

FIRST AID - IF SWALLOWED, CALL YOUR POISON CONTROL CENTER, HOSPITAL EMERGENCY ROOM OR PHYSICIAN IMMEDIATELY FOR INSTRUCTIONS TO INDUCE VOMITING. IN CASE OF EYE CONTACT, IMMEDIATELY FLUSH WITH WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION. FOR SKIN CONTACT, WASH THOROUGHLY WITH SOAPY WATER.

ENVIRONMENTAL HAZARDS: This product is toxic to humans, fish and wildlife. Do not apply directly to lakes, streams or ponds.

PHYSICAL AND CHEMICAL HAZARDS: COMBUSTIBLE. KEEP AWAY FROM HEAT, SPARKS AND OPEN FLAME.

KEEP OUT OF REACH OF CHILDREN

6200285

A 5% PENTA WOOD PRESERVATIVE TO STOP ROT AND DECAY IN UNFINISHED EXTERIOR WOOD. KILLS TERMITES AND MOST OTHER DESTRUCTIVE WOOD-BORING INSECTS INCLUDING LYCTUS (POWDER POST) BEETLE.

WE RECOMMEND SEAL-TREAT WHERE A WATER REPELLENT, CLEAR, AND PAINTABLE PENTA EXTERIOR WOOD PRESERVATIVE IS DESIRED.

DIRECTIONS

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

HOW TO APPLY: All cutting should be completed before application. Wood must be clean, dry and free from previous finishes. For best results, wood should be completely immersed. An immersion period of 5 minutes per inch of thickness is recommended. Where immersion is not practical, as in existing construction, two liberal brush applications are recommended.

COVERAGE: Varies by species and condition of wood. For general use of a 5% penta solution, estimate 150 to 200 sq. ft. per gal. for brush application, 5 to 10 gal. per thousand board feet for immersion treatment.

NOTE: Routine retreatment is not recommended due to the long life of Penta. Not for use on chip board or particle board.

STORAGE AND DISPOSAL: DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL. PESTICIDE OR RINSE WATER THAT CANNOT BE USED ACCORDING TO LABEL INSTRUCTIONS MUST BE DISPOSED OF ACCORDING TO FEDERAL OR APPROVED STATE PROCEDURES UNDER SUBTITLE C OF THE RESOURCE CONSERVATIONS AND RECOVERY ACT. DO NOT REUSE EMPTY CONTAINER. TRIPLE RINSE METAL CONTAINER. THEN OFFER FOR RECYCLING OR RECONDITIONING, OR PUNCTURE AND DISPOSE OF IN A SANITARY LANDFILL, OR BY OTHER APPROVED STATE AND LOCAL PROCEDURES.