

June 9, 2003

Mr. Roger E. Etherington  
Manager, Product Regulatory Support  
Vulcan Chemicals  
P.O. Box 385015  
Birmingham, AL , 35238-5015

Subject: **Vulcan Glazd Penta**  
EPA Registration Number 5382-16  
Application Dated March 7, 2003

Dear Ms. Amadio:

The following amendment, submitted in connection with registration under section of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comment:

**Proposed Amendment:**

- revised First Aid statement PR Notice 2001-1
- add advisory statements regarding use of treated wood

**General Comments:**

1. Add the statement "Do not contaminate water, food or feed by the storage or disposal" immediately following storage and disposal heading.
2. Add the word Pesticide to storage and disposal instruction heading. See PR Notice 83-3 for proper format and detailed information.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

3. Revise the ingredient statement to read as follows:

**ACTIVE INGREDIENTS**

Pentachlorophenol.....	86.0%
Other Chlorophenols and related Compounds.....	10.0%
INERT INGREDIENTS .....	4.0%
TOTAL.....	100.0%

4. Add the subheading "General precautions and Restrictions" above the statement

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.

5. Delete the statement

The registrant has complied with all terms and conditions of the registration governing the composition of this product as approved by the United States Environmental Protection Agency under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act.

The statement implies endorsement by the Agency.

**Other Comments:**

With respect to the First Aid - If Swallowed instruction, the Agency accepts your Medical Consultants that the statement be modified to reflect the wording provided in your letter of the above date. Therefore the First Aid Statement is acceptable.

Note that the Agency strongly recommend that a telephone number (toll free preferred) be listed on the label near the first aid statement for an emergency saturation.

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 Drusilla Copeland at (703) 308-6224.

Sincerely,



Adam Heyward

Product Manager (34)

Regulatory Management Branch II

Antimicrobials Division (7510C)

Enclosure

**RESTRICTED USE PESTICIDE**

This product has been determined to cause tumors and fetal toxicity in laboratory animals  
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.

**Vulcan****GLAZD<sup>®</sup> PENTA****PENTACHLOROPHENOL**

Pentachlorophenol, UN 3155, RQ

**TECHNICAL GRADE**

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

JUN - 9 2003

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

5382-16

ACTIVE INGREDIENTS ..... 96%  
Pentachlorophenol ..... 86%  
Other chlorophenols  
and related compounds ..... 10%  
INERT INGREDIENTS..... 4%

**KEEP OUT OF REACH OF CHILDREN****DANGER****POISON****FIRST AID**

- If swallowed:**
- Call a poison control center or doctor immediately for treatment advice.
  - Induce vomiting immediately, as directed by medical personnel.
  - Do not induce vomiting or give anything by mouth to an unconscious person.
- 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 inhaled:**
- Move person to fresh air.
  - If person is not breathing, call 911 or an ambulance, then give artificial respiration.
  - Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**NOTE TO PHYSICIAN**

This product is a metabolic stimulant. Treatment is supportive. Forced diuresis may be effective to reduce total body burden. Treat hyperthermia with physical measures. Do not administer aspirin, phenothiazines, or atropine since they may enhance toxicity.

**SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONS****Vulcan Chemicals**

A Business Group of Vulcan Materials Company / P O Box 385015 Birmingham Alabama 35238-5015

EPA Reg. No. 5382-16 EPA Est. 5382-KS-1

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER

May be fatal if swallowed, inhaled or absorbed through skin. Causes skin and eye irritation. Causes delayed chemical burns. Do not get either the dry material or solutions prepared from it in eyes, on skin or on clothing. Do not breathe vapors, spray mist, or dust. Use with adequate ventilation. Do not take internally. Wash thoroughly after skin contact, before eating, drinking, use of tobacco products, or using restrooms.

### ENVIRONMENTAL HAZARDS

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 apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other 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 the discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. Close container after each use.

### DIRECTIONS FOR USE

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

### MANUFACTURING USES

Vulcan Glazd® Penta is used for the formulation of fungicidal and insecticidal solutions, and for incorporation into other manufactured pesticide products. Each formulator and manufacturer is responsible for obtaining EPA registration for his end use product(s).

Manufacturers and formulators must use appropriate protective clothing and respiratory equipment at any time where employees may be exposed to pentachlorophenol.

### WOOD PRESERVATIVE USES

Vulcan Glazd® Penta must be dissolved prior to use as a wood preservative. Recommended concentrations for wood-treating solutions vary according to the end uses and methods of application to get the desired biological control.

For the preparation of wood preservation formulations and methods of applying them to wood, consult the current *American Wood-Preservers' Association Standards* or contact Vulcan Chemicals.

Solutions prepared from this product are for exterior use only. Do not use this product for preparation of solutions intended for home and farm use. Do not use on picnic tables, children's playground structures or horticultural lumber. Do not apply to logs used in construction of log homes. Do not use treated wood in farm buildings in area contacted by farm animals or in structures to contain animal feed or agricultural produce. Products treated with or containing this chemical are not to be used in food packaging material or in areas where food is processed, handled or stored.

Wood treated with pentachlorophenol must not be used where it will be in frequent or prolonged contact with bare skin (for example, chairs and other outdoor furniture), unless an effective sealer has been applied.

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Pentachlorophenol-treated wood must not be used in residential, industrial, or commercial interiors except for laminated beams or for building components which are in ground contact and are subject to decay or insect infestation and where two coats of an appropriate sealer are applied. Sealers may be applied at the installation site.

Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (e.g., handling freshly treated wood and manually opening cylinder doors).

Individuals who manually open cylinder doors must wear gloves and a respirator.

Individuals who enter, clean or repair pressure treatment cylinders, vats, tanks, and other related equipment that is contaminated with wood treatment formulation (e.g., cylinders that are in operation or are not free of the treatment solution) must wear a respirator, goggles and protective clothing (including overalls, jacket, gloves, boots, and head covering) impervious to the wood treatment formulation. 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 (e.g., manually opening/closing cylinder doors, moving trams out of cylinders, mixing chemicals, and handling freshly treated wood). Protective clothing must be changed when it shows signs of contamination. 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 treatment plant and disposed of in any general landfill, in the trash, or in any other manner approved for pesticide disposal.

#### **For Prilled or Flaked Formulations of Pentachlorophenol:**

After September 1, 1987, a closed system must be used when emptying and mixing prilled or flaked formulations of pentachlorophenol.

A closed system is defined as any containment which prevents the release of subject chemicals into the surrounding external environment, except that the release of incidental amounts of chemical during equipment loading and periodic clean-out or maintenance operations shall not be deemed a breach of containment.

Note to User: As used on this label, the term "respirator" means properly fitting, well-maintained, half-mask canister or cartridge respirators which are NIOSH/MSHA-approved for organic vapors and acid gases. Examples of acceptable materials for protective clothing (e.g., gloves, overalls, jackets, and boots) required during application and handling of pentachlorophenol are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, NBR (Buna-N), and nitrile. In addition, plastic-coated disposable coveralls impervious to dust are acceptable for dust protection.

For the spray method of application: 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, gloves, boots, and head covering) impervious to the wood treatment formulation and goggles.

### **STORAGE AND DISPOSAL**

**STORAGE:** Glazd® Penta should be stored in a dry, well-ventilated secure area in proper containers. Do not store penta solutions near sources of heat or near open flames. If package becomes ripped or punctured, apply tape to seal and prevent spillage. If a spill of dry product occurs, sweep up cautiously to avoid stirring up dust. Wear a respirator at all times. Do not store in an area where product can come into contact with foods, feeds or potable water.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. 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:** Completely empty drum or liner into application equipment. Triple rinse (or equivalent in accordance with 40 CFR § 261.7(b) (3) prior to offering for reconditioning, recycling or other disposal. For guidance, contact the nearest EPA regional office or State Agency authorized to administer the Resource Conservation and Recovery Act (RCRA).

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MEETS ASTM SPECIFICATION D 1272-56

**NOTICE TO BUYER**

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility including injury or damage, resulting from its misuse as such, or in combination with other materials.

Lot No.:

NET      lbs.

VMC-3099

Rev. 2/03