

JAN 29 1998

Wood Protection Products, Inc.
650 State Street
Charlotte, N.C. 28208

Attention: Mr. James C. Buchacker
Chemist - Wood Protection Products, Inc.

Subject: Penwar
EPA Registration Number 7234-7
Your Letter Dated December 18, 1997

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. In EPA letter dated May 30, 1997, comments #1 and #3, you were told to add the "Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless and in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and that the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing the product to sewer systems without previously notifying a local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA". "This statement must be included on your labeling, immediately below the environmental hazard statement"

2. Under the heading "Directions for Use" add the statement; "This product is intended for exterior use and above ground use."

CONCURRENCES

SYMBOL	4510W						
SURNAME	J. Buchacker						
DATE	1/29/98						

Submit three copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records. If you have any questions pertaining to this letter, please contact LaVerne Dobbins at (703) 308-6378.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Heyward', with a stylized flourish extending to the right.

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

Enclosure:

TEMENTS DOMESTIC ANIMALS

d, or absorbed through skin.
delayed chemical burns. Do
do not breathe vapors, spray
on. Do not take internally.
re eating, drinking, use of

achlorophenol can produce
animals. Exposure to
be avoided.

acco products during those
expose them to the wood
ning/closing cylinder doors,
nicals, and handling freshly

s to the wood treatment
contact is expected (e.g.,
opening cylinder doors).

rs must wear gloves and a

cylinders and other related
treatment formulation (e.g.,
e of the treatment solution)
eralls, jackets, gloves, and
mulation, and a respirator.

when it shows signs of
protective clothing and
plant. Worn-out protective
at the treatment plant and
ash, or in any other manner

he term "respirators" means
ask canister or cartridge
red for organic vapors and
rials for protective clothing
required during application
polyvinyl acetate (PVA),
(Buna-N), and nitrile. In
ls impervious to dust are

HAZARDS

not apply directly to water.
Do not apply when weather
do not contaminate water by

RESTRICTED USE PESTICIDE

DUE TO FETOTOXICITY AND ONCOGENICITY IN ANIMALS.

For sale to and use only by certified applicators or by
persons under their supervision and only for those uses
covered by the certified applicator's certification.

PENWAR

LABELED FOR PRESSURE TREATMENT USE

ACTIVE INGREDIENTS:

Pentachlorophenol*..... 4.48%

Other Chlorophenols and related compounds*.... 0.52%

INERT INGREDIENTS:..... 95.00%

TOTAL.....100.00%

*Equivalent to 5.21% Technical Pentachlorophenol

EPA Reg. No. 7234-07

Est. No. 7234-NC-2

KEEP OUT OF REACH OF CHILDREN DANGER

STATEMENT OF PRACTICAL TREATMENTS

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2
glasses of water and induce vomiting by touching back of throat with finger.
Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. Get medical attention.

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.

Refer To Additional Precautionary Information
Elsewhere On The Label Under The Heading
"Precautionary Statements:
Hazards To Humans And Domestic Animals".

ACCEPTED
with COMMENTS

in EPA Letter Dated:

JAN 29 1998

Manufactured by:

Wood Protection Products, Inc. : : : :

650 State Street : : : :

Chattanooga, NC 37403 : : : :

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 7234-7

NET CONTENTS: : : :

PHYSICAL AND CHEMICAL HAZARDS

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

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 use of this product for any purpose other
than those stated on the label, including use of this product in the
manufacture or formulation of other pesticide products or in
repackaging of the product, is prohibited.

DIRECTIONS FOR USE

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

This product is for the treatment of wood and wood products. This
product controls decay (rot) and molds, and preserves wood against
attack by fungi, Termites, Powder-Post Beetles and Carpenter Ants.
The solution should be used in accordance to current AWP
specifications for P9-Type C solvent systems. Products treated with this
preservative solution will pass stringent water-repellency tests and
extend the useful service life of the treated wood product. Treated
wood products may be stained, painted, or varnished.

STORAGE AND DISPOSAL

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

STORAGE: This product is classified as combustible. Store away from
sparks and open flames. If this product is allowed to fall below 65
degrees F, circulate and allow to warm to 65 degrees F before sampling
or use.

PESTICIDE DISPOSAL: 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.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for
recycling or reconditioning, or puncture and dispose of in a sanitary
landfill, or by other procedures approved by state and local authorities.

NOTICE: Seller makes no warranty, express or implied, concerning the
use of 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.