

7234-18

MAR 24 1986

Forshaw Chemicals  
650 State Street  
Charlotte, NC 28208

Attention: Mike H. Freeman

Gentlemen:

Subject: No-Mo-Stane, EPA Registration No. 7234-1  
Penwar, EPA Registration No. 7234-7  
Lumberite, EPA Registration No. 7234-9  
Pentacon-40, EPA Registration No. 7234-11  
No-Mo-Stane IV, EPA Registration No. 7234-15  
Penwar 1-5, EPA Registration No. 7234-16  
Cree-Pen, EPA Registration No. 7234-18  
Pre-Care, EPA Registration No. 7234-26  
No-Mo-Stane Liq., EPA Registration No. 7234-32  
Forpen-50, EPA Registration No. 7234-57  
Pentacon-5, EPA Registration No. 7234-60  
Pentacon 7, EPA Registration No. 7234-61  
Pentacon 10, EPA Registration No. 7234-62  
Lumberite Kondets, EPA Registration No. 7234-72  
Your Letter Dated February 7, 1986  
Telephone Communication Dated March 11, 1986

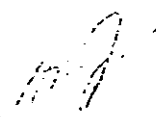
The purpose of this correspondence is to amend the Agency's letter of March 11, 1986, accepting the labeling of the products referred to above. This action will continue to accept the labeling with the incorporation of additional comments previously omitted because of review error. Five copies of the finished labeling must be submitted before you release the product for shipment.

Corrections will be required for the ingredient statements of those labels bearing incorrect percentages for each ingredient statement and the sum total in each product must read 100%. The decimal points and numbers must be correctly aligned for convenient reading purposes. The active ingredient percentage must be based upon the percentage accepted under the registration issuance, unless otherwise approved by the Agency under separate product registration amendments.

Delete such references to pentachlorophenol derivatives or related compounds from the active ingredient statements. The percentage of such references must be incorporated into the existing single active ingredient statement listed as pentachlorophenol. The same deletion recommendation applies to petroleum solvents, hydrocarbons, and repellents which are considered as inert ingredients. Their percentages must be incorporated into the inert ingredient statements. The sum of the active and inert ingredient percentages must total 100%.

As indicated in your February 7, 1986 letter, the confidential statement of formula that you intend to submit to the Agency in the near future must correctly correspond with each label's ingredient statement and must completely indicate accurate data itemized on the statements.

Sincerely yours,



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

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3cc 167988  
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MAR 11 1986

Forshaw Chemicals  
650 State Street  
Charlotte, NC 28208

Attention: Mike H. Freeman

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Pentacon 10, EPA Registration No. 7234-62  
Lumberite Rondets, EPA Registration No. 7234-72  
Your Letter Dated February 7, 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 at the next printing.

88884;Holes;J-5;KENCO;2/27/86;3/10/86;DKDvo


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Correct the spelling of "pentachlorophenol to' in the statement that reads "Do not apply pentachlorophenolto wood intended for farrowing or brooding facilities."

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

5067

PENTACHLOROPHENOL  
FOR GROUNDLINE TREATMENT OF UTILITY POLES

RESTRICTED USE

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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

Product name: CREE-PEN

MAR 24 1986

Ingredient statement:

ACTIVE INGREDIENTS:	
Pentachlorophenol	9.05%
Other Chlorinated Phenols	1.05%
Sodium Fluoride	15.00%
Creosote	30.00%
Petroleum Hydrocarbons	8.00%
Coal Tar Hydrocarbons	30.00%
Inert Ingredients	6.90%
TOTAL:	100.00%

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

7234-18

#99.10

\*Equivalent to 10.5% Technical Pentachlorophenol, as defined by Fed. Spec. TT-W-570.

\*\*Equivalent to AWWA Standard P1-78.

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. Call a physician.

If on skin: Wash with plenty of soap and water. Get medical attention.

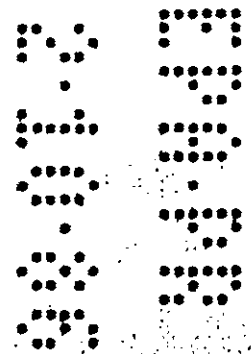
If inhaled: Remove victim to fresh air. Get medical attention.

NOTE TO PHYSICIAN: This product is a metabolic stimulant. Causes hyperthermia. Treat symptomatically.

Refer to additional precautionary information elsewhere on the label under the heading "Precautionary Statements: Hazards to Humans and Domestic Animals".

Forshaw Chemicals, Inc.  
650 State Street  
Charlotte, NC 28208  
EPA registration number: 7234-18  
Establishment number: 7234-NC-2  
Net Contents:

ACCEPTED  
MAR 11 1986  
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 7234-18



### Precautionary Statements: Hazards to Humans and Domestic Animals

Danger: May be fatal if swallowed, inhaled, or absorbed through skin. Do not get in eyes, on skin or on clothing. Causes delayed chemical burns. Do not take internally. Avoid breathing vapors, spray mist, or dust. Use with adequate ventilation. Wash thoroughly after skin contact, and before eating, drinking, use of tobacco products, or using restrooms.

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.

Applicators must wear gloves impervious to the wood treatment formulations (e.g., polyvinyl acetate (PVA), polyvinyl chloride (PVC), or neoprene) in all situations where dermal contact is expected (e.g., during the actual application process and when handling freshly treated wood).

Applicators must wear long sleeved shirts, long pants, and an impermeable apron during the application and mixing processes and all situations where dermal contact is expected.

Work clothing must be changed when it shows signs of contamination. Launder work clothing separately from other household clothing. Dispose of worn-out work clothing and workshoes or boots in any general landfill, in the trash, or in any other manner approved for pesticide disposal.

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

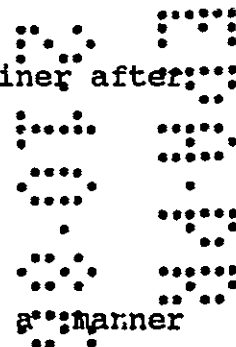
This product is toxic to fish and wildlife. Do not apply directly to water. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes.

### Physical and Chemical Hazards

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

### Directions for Use

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



Apply CREE-PEN by towel, brush, paddle or mechanical spreader evenly to the wood surface to be treated. May also be applied by mechanically driven pump or grease gun. When applying to deep checks or splits, holes or other cavities fill a caulking gun with CREE-PEN and apply. Any grease equipment which handles No. 2 cup grease will easily handle CREE-PEN.

Excavate the soil away from the pole to a depth of at least 18 inches in medium or heavy rainfall areas and to a depth of 24 inches or deeper in low rainfall or arid areas. Brush the surface of the pole to remove adhering soil, then scrape away any surface decay. Check pole interior by use of an increment borer or brace and bit. Check increment borer core or the trash from brace and bit for evidence of unsound wood. If interior decay is evident replacement of the pole may be necessary. Follow recommended practices in determining whether pole should be replaced.

The sodium fluoride portion of CREE-PEN will penetrate wet wood promptly. The Pentachlorophenol in oil and Creosote will penetrate the wood more slowly. It is not necessary to leave excavated poles exposed to weather before or after treating with CREE-PEN.

For average groundline treatment apply CREE-PEN in a layer at least 1/4 inch thick. Special conditions may require more. The paper supplied with CREE-PEN is 24 inches wide. Applications to this paper by dispenser is for a width of 18 to 22 inches. When applied to the pole the width becomes the height of the application. If more than 22 inch applications are necessary, use additional strips layered with CREE-PEN. Apply CREE-PEN at least 4 inches below any evidence of decay and at least 3 inches above ground. On hillside or other special places it may be necessary to cut special sizes of paper and to apply the CREE-PEN directly to pole surface before covering with paper.

### Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal. Storage: Store as a pesticide

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.

