

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

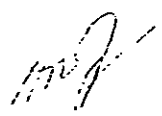
The purpose of this correspondence is to amend the Agency's letter of March 11, 1986, accepting the labeling of the products referred to above. This action will continue to accept the labeling with the incorporation of additional comments previously omitted because of review error. Five copies of the 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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MAR 11 1986

Forshaw Chemicals
650 State Street
Charlotte, NC 28208

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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:Notes:J-5:KENCO:2/27/86:3/10/86:DKDvo

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

PENTACHLOROPHENOL
PRESSURE TREATMENT USE

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.

Product name: FORPEN -50

Ingredient statement:

	Pentachlorophenol	43.0%
Other Chlorophenols and Related Compounds		5.0%
	Petroleum Solvents	50.0%
	Inert Ingredients	2.00%

100%

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.

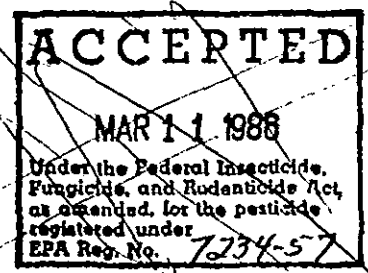
If on skin: Wash with plenty of soap and water. Get medical attention.

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

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

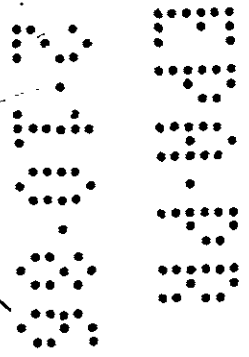
Refer to additional precautionary information elsewhere on the label under the heading "Precautionary Statements: Hazards to Humans and Domestic Animals".

Forshaw Chemicals, Inc.
650 State Street
Charlotte, NC 28208
EPA registration number: 7234-57
Establishment number: 7234-NC-2
Net Contents:



ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAR 11 1986
AND
MAR 24 1986

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No. 7234-57



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 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.

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.

For prilled or flaked formulations of pentachlorophenol:

Until August 31, 1987, a closed emptying and mixing system must be used or protective clothing (including respirator, gloves, and long-sleeved shirts and long pants or disposable coveralls) must be worn when emptying and mixing powder formulations of pentachlorophenol. After September 1, 1987, a closed system must be used when emptying and mixing powder 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 release of incidental amounts of chemical during equipment loading and periodic clean-out or maintenance operations shall not be deemed a breach of containment.

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).

Applicators must wear gloves impervious to the wood treatment formulations 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 pressure treatment cylinders 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 protective clothing (including overalls, jackets, gloves, and boots) impervious to the wood treatment formulation, and a respirator.

Protective clothing must be changed when it shows signs of contamination. Launder non-disposable protective clothing separately from other household clothing. 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.

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 polynuclear aromatics and organic vapors. 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.

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 a manner inconsistent with its labeling.

To make a ready-to-use solution for wood preservation mix this concentrate with a diluent petroleum solvent. This product mixes easily with solvents such as kerosene, fuel oil, mineral spirits, or other petroleum distillates. Final mixture of this product will depend on the density of the diluent oil. Solutions containing pentachlorophenol in ranges of 1 to 40% have been used successfully in treating wood to extend its useful service life. Wood products treated with correct amounts of pentachlorophenol will be protected against fungal attack, termite, stain and other delay organisms.

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal. Storage: Storage of this product in unheated vessels is possible. Viscosity increases as temperatures decrease. **KEEP AWAY FROM FIRE. DO NOT STORE NEAR OPEN FLAME.**

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 in a sanitary landfill, or by other procedures approved by state and local authorities.

CONSUMER INFORMATION SHEET

CONSUMER INFORMATION

This wood has been preserved by pressure treatment with an EPA-registered pesticide containing pentachlorophenol to protect it from insect attack and decay. Wood treated with pentachlorophenol should be used only where such protection is important.

Pentachlorophenol penetrates deeply into and remains in the pressure-treated wood for a long time. Exposure to pentachlorophenol may present certain hazards. Therefore, the following precautions should be taken when handling the treated wood and in determining where to use or dispose of the treated wood.

USE SITE PRECAUTIONS FOR PENTACHLOROPHENOL PRESSURE-TREATED WOOD

Logs treated with pentachlorophenol should not be used for log homes.

Wood treated with pentachlorophenol should 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.

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

Wood treated with pentachlorophenol should not 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.

In interiors of farm buildings where domestic animals or livestock are unlikely to crib (bite) or lick the wood, pentachlorophenol-treated wood may be used for building components which are in ground contact and are subject to decay or insect infestation if two coats of an effective sealer are applied. Sealers may be applied at the installation site.

Do not use pentachlorophenol-treated wood for farrowing or brooding facilities.

Do not use treated wood under circumstances where 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 treated wood for cutting-boards or countertops.

Only treated wood that is visibly clean and free of surface residue should be used for patios, decks and walkways.

Do not use treated wood for construction of those portions of beehives which may come into contact with the honey.

Treated wood should not be used where it may come into direct or indirect contact with public drinking water, except for uses involving incidental contact such as docks and bridges.

Do not use pentachlorophenol-treated wood 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.

HANDLING PRECAUTIONS FOR PENTACHLOROPHENOL PRESSURE-TREATED WOOD

Dispose of treated wood by ordinary trash collection or burial. Treated wood should not be burned in open fires or in stoves, fireplaces, and residential boilers because toxic chemicals may be produced as part of the smoke and ashes. Treated wood from commercial or industrial use (e.g., construction sites) may be burned only in commercial or industrial incinerators or boilers rated at 20 million BTU/hour or greater heat input or its equivalent in accordance with state and federal regulations.

Avoid frequent or prolonged inhalation of sawdust from treated wood. When sawing and machining treated wood, wear a dust mask. Whenever possible, these operations should be performed outdoors to avoid indoor accumulations of airborne sawdust from treated wood.

Avoid frequent or prolonged skin contact with pentachlorophenol-treated wood; when handling the treated wood, wear long sleeved shirts and long pants and use gloves impervious to the chemicals (for example, gloves that are vinyl-coated).

When power-sawing and machining, wear goggles to protect eyes from flying particles.

After working with the wood, and before eating, drinking, and use of tobacco products, wash exposed areas thoroughly.

If oily preservative or sawdust accumulate on clothes, launder before reuse. Wash work clothes separately from other household clothing.

Urethane, latex epoxy enamel, shellac, and varnish are acceptable sealers for all pentachlorophenol-treated wood.

