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MAR 2 4 1986

Forshaw Chemicals 650 State Street Charlotte, NC 28208

Attention: Mike H. Freeman

Gentlemen:

Ro-Mo-Stane, EPA Registration No. 7234-1 Subject: Penwar, EPA Registration No. 7234-7 Lumberite, EPA Repistration No. 7234-9 7234-11 Pentacon-40, EPA Registration No. No-Mo-Stane IV, EPA Registration No. 7234-15 Penwar 1-5, EPA Registration No. 7234-16 Gree-Pen, EPA Registration No. 7234-18 Pre-Care, EPA Registration No. 7234-26 No-Mo-Stane Liq., FPA Registration No. 7234-32 Forpen-50, EPA Registration No. 7234-57 Pentacon-5, EPA Registration No. 7234-60 Pentacon 7, FPA 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 convient 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 confidental 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,

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

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MAR | | 1986

Forshaw Chemicals 650 State Street Charlotte, NC 28208

Attention: Mike H. Freeman

Gentlemen:

Subject: No-Mo-Stane, BPA Registration No. 7234-1 Penwar, EPA Registration No. 7234-7 Lumberite, BPA 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, BPA 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, BPA Registration No. 7234-60 Pentacon 7, EPA Registration No. 7234-61 Pentacon 10, EPA Registration No. 7234-62 Lumberite Rondets, EPA Registration No. 7234-72 Your Letter Dated Feburary 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.

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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,

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

Enclosures

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**ACCEPTED** with COMMENTS MAR 11980 AND PENTACHLOROPHENOL MAR 2 4 1986 NON-PRESSURE TREATMENT PLANT USE the feat of i de, mare, mai Bedeuloue Art amended for the a white For sale to and use only for by certified applicators or by persons under their supervision and only for those uses covered by the second 7234-62 certified applicator's certification. Product name: PENTACON - 10 Ingredient statement: Pentachlorophenol 8.8% Other Chlorophenols and Related Compounds 1.2% Petroleum Solvents 89.6% Inerts 0.40% Keep Out of Reach of Children 100 % 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 scap 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". with COMDIENTS to EPA Letter Dotede Forshaw Chemicals, Inc. 650 State Street cida. Charlotte, NC 28208 Act EPA registration number: 7234i le Establishment number: 7234-NC-2 Net Contents: loicidí. as américaed estatered und EPA Reg. No

# Frecautionary 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 mixing powder worn when emptying and formulations of pentachlorophenate. After September 1, 1987, a closed system must be used when emptying and mixing powder formulations of pentachlorophenate. 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.

### 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, spr v 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.

Individuals who enter, clean, or repair vats, tanks or related equipment that is contaminated with wood treatment solution must wear a respirator. In addition, where dermal is exposed, these individuals must wear overalls, jackets, boots, head covering impervious to the wood treatment formulation, and goggles... 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.

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. Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (for example, during the application process and when handling freshly treated wood).

Do not apply to logs used in construction of log homes.

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.

WOOD PRESERVATION: Where maximum protection of wood out of salt water locations is desired use wood pressure treated with Pentachlorophenol solutions. When lesser protection will suffice or Pentachlorophenol pressure treated wood is not available .apply ready-to-use solutions to wood by the following methods: .Het and Cold Bath Process (Thermal Process). Cold soaking, dipping, brushing and spraying. Results obtained will be dependent on depth of penetration and retention of preservative. Where severe exposure conditions prevail use hot and cold bath or cold .soaking. Fence posts should be debarked and dried, and cold soaked for 24 to.... 72 hours depending on whether the treatment is made in the "summer"... or winter. Treat lumber for severe exposure conditions by. soaking. at least three hours per inch of thickness. Dipping, brushing and ... PENTACON absorbed the better the treatment.

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Wood products preservatively treated as recommended above will be protected against fungus growths which cause rot and stain, against termites and powder post (Lyctus) beetles.

Brush, Spray and Swabbing treatments may be used on lumber in place and exposed to less severe conditions of decay. Protection will be afforded against powder post beetles (Lyctus) fungal growths which cause rot and stain.

For wood in contact with the soil a complete immersion for 3 minutes or 2 heavy applications with brush or spray is a minimum requirement.

#### 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.

PENTACHLOROPHENOL FOR HOME AND FARM USE and RAILROAD TIE REPAIR

# 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: PENTACON - 10

Ingredient statement:

Pentachlorophenol 8.8% Other Chlorophenols and Related Compounds 1.2% Petroleum Solvents 89.6% Inerts 0.40%

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: 7234-62-Establishment number: 7234-NC-2 Net Contents:

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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, Use with adequate ventilation. spray mist, or dust. Wash thoroughly after skin contact, before eating, drinking, use of tobacco products, or using restrooms.

The U.S. EPA has determined that pentachlorophenol defects in the offspring of laboratory animals. can produce Exposure to pentachlorophenol during pregnancy should be avoided.

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 polynuclear aromatics and organic vapors.

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).

protective Spray applicators must wear 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 processes (e.g., brush on) must wear long sleeved shirts, long pants and an impermeable apron. Launder work clothing separately from other household laundry.

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

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.

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 the soil in barns, stables, and similar sites and which are subject to decay or insect infestation; and mirlwork which are subject to decay or insect infestation; and mirlwork, which has outdoor surfaces (e.g., doorframes, windows and patio ... which has outdoor surfaces (e.g., doortioner, sealed, frames). Interior surfaces of the treated wood should be sealed....

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with two coats of an appropriate sealer. Sealers may be applied at the installation site.

Do not apply pentachlorophenolto wood intended for farrowing or brooding facilities.

Do not apply pentachlorophenol to wood in ended 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 are applied. Sealers may be applied at the installation site.

Do not apply to wood intended to be used in a manner in which 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 countertops.

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 for use where it may come into direct or indirect contact drinking water for the public and domestic animals or livestock except for those 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 re-use. 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.

This product should not be used to treat wood which will be in frequent or prolonged contact with skin, unless an effective sealer has been applied.

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....

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

## 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.

WOOD PRESERVATION: Where maximum protection of wood out of salt water locations is desired use wood pressure treated with Pentachlorophenol solutions. When lesser protection will suffice or Pentachlorophenol pressure treated wood is not available apply ready-to-use solutions to wood by the following methods: Hot and Cold Bath Process (Thermal Process). Cold soaking, dipping, brushing and spraying. Results obtained will be dependent on depth of penetration and retention of preservative. Where severe exposure conditions prevail use hot and cold bath or cold soaking. Fence posts should be debarked and dried, and cold soaked for 24 to 72 hours depending on whether the treatment is made in the summer or winter. Treat lumber for severe exposure conditions by soaking at least three hours per inch of thickness. Dipping, brushing and spraying may be used on less severe exposure conditions. The more PENTACON absorbed the better the treatment.

Wood products preservatively treated as recommended above will be protected against fungus growths which cause rot and stain, against termites and powder post (Lyctus) beetles.

termites and powder post (Lyctus) beetles. Brush, Spray and Swabbing treatments may be used on lumber in place and exposed to less severe conditions of decay. Protection will be afforded against powder post beetles (Lyctus) fungal growths which cause rot and stain.

For wood in contact with the soil a complete immersion for 3 minutes or 2 heavy applications with brush or spray is a minimum requirement.

#### Storage and Disposal

Do not contaminate water, food, or feed \_ / 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.

Household/domestic use container disposal: Securely wrap original pesticide container in several layers of newspaper and discard in the trash. Do not reuse empty containers.

Treated wood disposal: Wood which has been treated with this product should be disposed of 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.

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# 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.

Product name: PENTACON - 10

Ingredient statement:

Pentachlorophen 8.8% Other Cholrophenols and Related Compounds 1.2% Petroleum Solvents 89.6% Inerts 0.4%

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-Establishment number: 7234-NC-2 Net Contents: ACCEPTED With COMMENTS to EPA Letter Dated: MAR 11 1995 MAR 2 4 1986 1.84

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Under the Federal Insecticide, Fungicide, and Rodenticide Vet annended, for the pass site registered under EPA Rep. 200, 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 ...

### Directions for Use

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

After excavating and inspecting pole, pour this product around pole and into soil as pole is back-filled. Use from 1-1/2 to 5 gallons depending on size of pole and upon the specification existant. This product can also be used to soak absorbent bandages for pole repair and may be injected into poles using low-pressure application techniques.

### 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.

# 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: PENTACON - 10

Ingredient statement:

Pentachlorophenol 8.8% Other Chlorophenols and Related Compounds 1.2% Petroleum Solvents 89.6% Inert Ingredients 0.40%

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: Establishment number: 7234-NC-2 Net Contents: MAC II 1998 MAR 2 4 1986 Under the Federal Insecticide Fungicide, and Rodenticide Act mannonded, for the posticide registered under EPA Reff. No. 7234-102

ACCEPTED with COMMENTS to EPA Letter Dates

# 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 emptying and mixing powder worn when formulations of pentachlorophenate. After September 1, 1987, a closed system must be used when emptying and mixing powder formulations of pentachlorophenate. 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 the 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.

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# 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.

This product is to be used for the protection of wood and wood products. This product requires no dilution. Use at the supplied strength and concentration. For current industry practices, consult applicable AWPA standards. For pressure treatment use only.

# Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal. Storage: Store as a pesticide in a secure tank or storage vessel. Transport of this material requires specific D.O.T. labels and wording on bills of lading.

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 of 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.

# CONSUMER INFORMATION SHEET

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#### 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 farrbwing 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 bridge.

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.

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