

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: Pentacon-10
EPA Registration Number 7234-62
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."

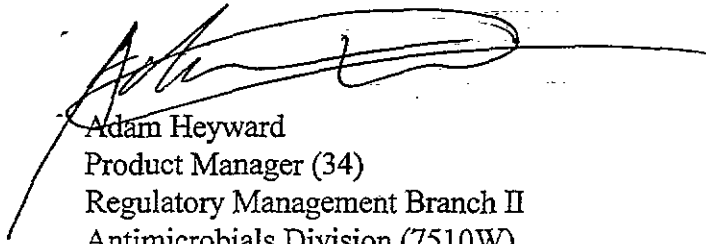
2. Under the heading "Directions for Use" add the statement; "This product is intended for exterior use and above ground use."

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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,



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

Enclosure:

**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 pentachlorophenolate. After September 1, 1987, a closed system must be used when emptying and mixing powder formulations of pentachlorophenolate. 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 formulations (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 a part 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.

(Continued on next panel)

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.

PENTACON - 10

LABELED FOR PRESSURE TREATMENT USE

ACTIVE INGREDIENT:	
Technical Pentachlorophenol.....	10.42%
INERT INGREDIENTS:	89.58%
TOTAL	100.00%

EPA Reg. No. 7234-62-

EPA 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. Causes hyperthermia. Treat symptomatically.

Refer To Additional Precautionary Information Elsewhere On

ACCEPTED The Label Under The Heading "Precautionary Statements:
with **COMMENTS** Hazards To Humans And Domestic Animals"
in EPA Letter Dated:

JAN 29 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 7234-62

Manufactured by:
Wood Protection Products, Inc.
650 State Street
Charlotte, NC 28208

(Continued)

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.

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 AWWA 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 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.

WPC