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MAR 1 1 1986

Forshaw Chemicals 650 State Street Charlotte, NC 28208

Attention: Mike H. Freeman

Gentlemen:

No-Mo-Stane, EPA Registration No. 7234-1 Subject: 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 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.

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 Hanager (21) Funyicide-Herbicide Branch Registration Division (TS-767C)

Enclosures

MAR 24 1986

Forshaw Chemicals 650 State Street Charlotte, NC 28208

Attention: Mike H. Freeman

Gentlemen:

Subject:

No-Mo-Stane, EPA Registration No. Penwar, EPA Registration No. 7234-7 Lumberite, EPA Registration No. Pentacon-40, EPA Registration No. 7234-11 No-Mo-Stane IV, EPA Registration No. 7234-15 Penwar 1-5, EPA Registration No. 7234-16 7234-18 Cree-Pen, EPA Registration No. Pre-Care, EPA Registration No. 7234-26 No-Mo-Stane Liq., RPA Registration No. 7234-32 Porpen-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 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,

Henry M. Jacoby Product Manager

Fungicide-Herbicide Branch

Registration Division (TS-767c)

PENTACHLOROPHENOL FOR SAPSTAIN CONTROL

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: LUMBERITE RONDETS

Ingredient statement:

Sodium Pentachlorophenate 79% Sodium Salts of other Chlorophenols 11% Inert Ingredients 10% TOTAL: 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: 7234-72
Establishment number: MSEMIRICA2
Net Contents: with COMMENTS
In EPA Lever Durect

Mor, 11, 1986

MAR 24 1986

Under the Federal Insecticide, Funcicide, and Redesticide Act an amended, for the pesticide registered under EPA Rog. No.

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Under the Federol Insecticite.
Funnifolds, ond Redenticité Nei
as emonted, for the posterie
restistates d'under
EPA Beg. No. 1234-124

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 powder formulations of pentachlorophenate:

Until August 31, 1987, a closed emptying and mixing system must be used or protective clothing (including respirator, gloves, long-sleeved shirts and long pants or disposable coveralls) must be emptying and mixing powder formulations when pentachlorophenate. After September 1, 1987, a closed system must be used when emptying and mixing powder formulations pentachlorophenate. A closed system is defined as any containment which prevents the release of subject chemicals into surrounding external environment, except that release of incidental amounts of chemical during equipment loading and periodic clean-out maintenance operations shall not be deemed a breach 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, spray 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...

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 irreship treated wood).

Protective clothing must be changed when it shows signs of contamination. Launder non-disposable protective tlothing... 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.

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).

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.

LUMBER. Dissolve 5 lbs. LUMBERITE RONDETS in 100 gallons of water. Dip or spray the fresh green lumber in this solution to thoroughly wet the boards. If necessary, add alkali to the solution to maintain a pH in excess of 7.5 at all times. Avoid excessively alkaline solutions since they may cause discoloration of beech and other hardwoods.

LOGS. Spray ends and debarked areas of fresh logs with a solution of 10 lbs. LUMBERITE RONDETS in 100 gallons water.

POLES, TIES, and TIMBERS. Dip or spray entire surface with a solution of 10 lbs. LUMBERITE RONDETS in 100 gallons water. Spray again when seasoning checks develop. Maintain pH in excess of 7.5 at all times. Properly stack all lumber dipped in LUMBERITE RONDETS solution in piles with good foundations to allow adequate ventilation. Roof all piles to protect lumber from rain. Control of vegetation around stacks is recommended to afford better air circulation.

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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

