



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 28, 2024

Ms. Kresti Lyddon  
Agent for Drexel Chemical Company  
Lewis & Harrison LLC  
2461 South Clark Street, Suite 710  
Arlington, VA 22202

Subject: Registration Review Label Amendments Incorporating Mitigation from the National Marine Fisheries (NMFS) Biological Opinion (BiOp) on the Effects of Chlorpyrifos  
Mitigation and General Updates  
Product Name: CHLORPYRIFOS 4 WOOD  
EPA Registration Number: 19713-300  
Application Date: March 29, 2022; August 31, 2022; June 16, 2023; February 29, 2024; and March 25, 2024  
Decision Number: 582852

Dear Kresti Lyddon:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Chlorpyrifos 2022 Biological Opinion and has concluded that your submission is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

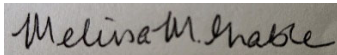
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the

Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Melissa Grable at (202) 564-5198 or at [grable.melissa@epa.gov](mailto:grable.melissa@epa.gov).

A rectangular box containing a handwritten signature in black ink that reads "Melissa M. Grable".

Melissa M. Grable

Team Leader, Risk Management and Implementation Branch I (RMIB I)  
Pesticide Re-Evaluation Division (PRD)  
Office of Pesticide Programs (OPP)

Enclosure

**RESTRICTED USE PESTICIDE**

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

**ACCEPTED**  
 03/28/2024  
 Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 19713-300



**Chlorpyrifos 4 Wood**  
 Concentrate

**FOR USE IN TREATMENT OF WOOD PRODUCTS IN NON-RESIDENTIAL AND INDUSTRIAL PLANT SITES ONLY.**

**ACTIVE INGREDIENT:**

Chlorpyrifos.....44.9%

**OTHER INGREDIENTS:\***.....55.1%

**TOTAL**.....100.0%

This product contains 4 pounds of Chlorpyrifos per gallon.

\*Contains aromatic petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN**  
**WARNING / AVISO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See **FIRST AID** Below

EPA Reg. No. 19713-300  
 EPA Est. No. 19713-XX-X

**Net Contents:**  
 \_\_\_\_\_ Gals. ( \_\_\_\_\_ L)

FIRST AID
<p><b>IF SWALLOWED:</b></p> <ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not give any liquid to the person.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious or convulsing person.</li> </ul>
<p><b>IF IN EYES:</b></p> <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>
<p><b>IF ON SKIN OR CLOTHING:</b></p> <ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> </ul>
<p><b>IF INHALED:</b></p> <ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also call CHEMTREC at 800-424-9300 for emergency medical treatment information.</p>
<p><b>NOTE TO PHYSICIAN:</b> Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate degree of exposure (baseline data are useful). Atropine, only by injection, is the preferable antidote. Oximes such as 2-PAM/ protropam may be therapeutic if used early; however, use only in conjunction with atropine. In case of severe, acute poisoning, use antidotes immediately after establishing an open airway and respiration. May pose an aspiration pneumonia hazard. Contains petroleum distillate.</p>


 Manufactured By:  
**Drexel Chemical Company**  
 P.O. Box 13327, Memphis, TN 38113-0327  
**SINCE 1972**

The DREXEL logo is a registered trademark of Drexel Chemical Company.

300SP-0612\*

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**WARNING:** May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Do not get in eyes, or on skin. Avoid breathing vapors or spray mist. Wash thoroughly after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse. Keep away from food, feedstuffs and water supplies.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

**All mixers, loaders, applicators and handlers must wear:** Coveralls over long-sleeved shirt and long pants, chemical-resistant footwear plus socks, chemical-resistant gloves made of barrier laminate or viton, chemical-resistant apron when mixing or loading or exposed to the concentrate, chemical-resistant headgear for overhead exposures, and a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any R, P, or HE filter.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

## USER SAFETY RECOMMENDATIONS

**Users should:** Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, small mammals and birds. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash water or rinsate.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

## PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame. Do not cut or weld container.

## DIRECTIONS FOR USE

### RESTRICTED USE PESTICIDE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

## USE PRECAUTIONS AND RESTRICTIONS

Use as a wide area/general outdoor treatment for ants and other miscellaneous pests (excludes wide-area mosquito adulticide use) is prohibited.

All leaks resulting in the deposition of this product in locations other than those prescribed on this label must be cleaned up prior to leaving the application site.

Contamination of public and private water supplies must be avoided by following these precautions:

1. Do not apply within 25 feet of aquatic habitats (such as, but not limited to, lakes, reservoirs, rivers, permanent streams, wetlands or natural ponds, estuaries, and commercial fish farm ponds).
2. Do not apply directly to, or allow the product to enter sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
3. Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
4. Do not apply to vertical surfaces directly above pervious or impervious surfaces that drain into ditches, storm drains, gutters, or surface waters.
5. Do not apply or irrigate to the point of runoff.
6. Use anti-backflow equipment or procedures to prevent siphonage of pesticide back into water supplies.
7. Do not treat soil that is water-saturated or frozen.
8. Do not treat while precipitation is occurring.
9. Do not contaminate wells or cisterns.
10. Consult Federal, State and Local specifications for information regarding approved treatment practices in your area.

Reporting Ecological Incidents: To report ecological incidents, including mortality, injury, or harm to plants and animals, call 901-774-4370.

### Treatment of Wood Products (Rights-of-Way, Manufacturing, or Industrial Sites Only)

To prevent insect attack of wood product, this product may be used for treatment of fence posts, utility poles, railroad ties, landscape timbers, logs, poles, and posts.

### Dosage and Mixing Directions

This product is recommended for use as an aqueous emulsion containing 0.5% to 1.0% Chlorpyrifos. See following table for dilution directions.

Gals. of finished dilution desired	This Product		
	0.5% Solution	1.0% Solution	2.0% Solution
1	1.33 fl. oz.	2.66 fl. oz.	5.33 fl. oz.
5	6.66 fl. oz.	13.33 fl. oz.	26.66 fl. oz.
10	13.33 fl. oz.	26.66 fl. oz.	53.33 fl. oz.
24	1 qt.	0.5 gal.	1 gal.
48	0.5 gal.	1 gal.	2 gal.
97	1 gal.	2 gal.	4 gal.

To control Ambrosia beetles (Scolytidae), Deathwatch beetles (Anobiidae), False powderpost beetles (Bostrichidae), Old house borers (Cerambycidae) and Powderpost beetles (Lyctidae), treatments may be applied either as coarse sprays or by brushing the product onto targeted surfaces. Use sufficient amount of spray to cover the area to the point of wetness but avoiding runoff. Use the following guidelines to determine appropriate rates of application:

Type of Wood	Diluted Spray	Area to be Sprayed (as a coarse spray)
New Wood (typically less than 10 years of age)	1 gal.	150 sq. ft.
Old Wood (typically greater than 10 years of age)	1 gal.	100 sq. ft.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

**PESTICIDE STORAGE:** Store in original container in secured, dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Avoid storing above 122°F for extended periods of time. Storage below 40°F may result in formation of crystals. If product crystallizes, store at 55°F to 75°F and shake occasionally to redissolve crystals. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

**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 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:

**Nonrefillable Container (rigid material; less than 5 gallons):** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**Nonrefillable Container (rigid material; 5 gallons up to < 250 gallons):** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**Refillable Containers (≥ 250 gallons & Bulk):** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

## WARRANTY—CONDITIONS OF SALE

The uses of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the Seller. To the extent allowed by applicable laws, buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent allowed by applicable laws, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

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