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APR 18 1986

FarmCo Industries, Inc.
576 North Lake Drive
Matartown, SD 57201

Attention: Raymond F. Hughes

Gentlemen:

Subject: FarmCo Wood Treatment TC Penetrating Penta Coating
EPA Registration No. 46778-1
FarmCo Wood Treatment Gel Penetrating Penta Coating
EPA Registration No. 46778-2
Your Letter Dated February 26, 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.

- Change "Warning" to "Danger" on page 3 of the label.

Stamped copies of each label are enclosed for your records.

Sincerely yours,

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

Enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated:

- Important Notice**
1. Place cartridge in caulking gun.
 2. Cut off plastic tip to make 1/8" bead.
 3. Puncture seal inside spout.
 4. Always place drip cap firmly on end of spout of partially used cartridge.
 5. Keep from freezing, do not store near heat or open flame.
 6. Store and transport cartridges in upright position.



FarmCo

APR 21 1986

WOOD TREATMENT

GEL

It is a violation of the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 46778-2

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER:
Corrosive, causes eye and skin damage. May be fatal if swallowed, inhaled or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield when handling. Wear PVC, neoprene or Buna-N gloves and protective clothing while applying product and handling pentachlorophenol treated lumber.

May be fatal if swallowed. Do not breathe vapor, dust or spray mist. Do not get in eyes, on skin or clothing. In case of skin contact, wash immediately with soap and water. Avoid contamination of feed and foodstuffs.

Ventilate treated areas until vapors have dispersed.

Wear protective clothing and PVC, neoprene or Buna-N gloves when handling the freshly treated lumber.

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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

PENETRATING PENTA COATING

RESTRICTED USE PESTICIDE: FOR SALE AND USE ONLY BY CERTIFIED APPLICATORS OR BY PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATORS' CERTIFICATION. FOR THE PRESERVATIVE TREATMENT OF POLES AND STUBS IN LINE, TIMBER STRUCTURES, CUTS AND HOLES IN TREATED WOOD, AND EXPOSED TIMBER AND LUMBER SURFACES IN BUILDINGS, TO PROTECT AGAINST FUNGI, DECAY, CARPENTER ANTS, WOOD DESTROYING BEETLES AND TERMITES AND AS A SUPPLEMENTAL TREATMENT FOR TERMITE CONTROL. NOT TO BE USED FOR THE GENERAL TREATMENT OF FINISHED BUILDINGS.

ACTIVE INGREDIENTS:

Pentachlorophenol	8.69%
Other Chlorophenols & Related Compounds	1.01%
Pine Oil	10.10%
Aromatic Petroleum Solvent	62.85%
INERT INGREDIENTS: 17.35%	
Total	100.00%

**KEEP OUT OF REACH
OF CHILDREN
DANGER**

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Drink one or two 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. Get medical attention immediately.

If Inhaled: Remove victim to fresh air and apply respiration if indicated.

If On Skin: Wash promptly with soap and water. Rinse thoroughly.

If In Eyes: Rinse eyes for at least 15 minutes with water and call a physician immediately.

See side panel for additional precautions and directions for use.

EPA Establishment No 46778-SQ-G;
EPA Registration No 46778-Z

NET CONTENTS

10.5 FL. OZ.
(298 GM.)

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WOOD TREATMENT



PENETRATING PENTA COATING

KEEP OUT OF REACH OF CHILDREN - DANGER

Manufactured By FarmCo Industries, Inc.

RESTRICTED USE PESTICIDE

FOR SALE AND USE ONLY BY CERTIFIED APPLICATORS OR BY PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATORS' CERTIFICATION

For the preservative treatment of poles and stubs in line, timber structures, cuts and holes in treated wood, and exposed timber and lumber surfaces in buildings, to protect against fungi, decay, carpenter ants, wood destroying beetles and termites and as a supplemental treatment for termite control.

Not to be used for the general treatment of finished buildings.

EPA Establishment No. 46778-SD-01

EPA Registration No. 46778-2

TAKE TIME



OBSERVE LABEL
DIRECTIONS

Prepared By

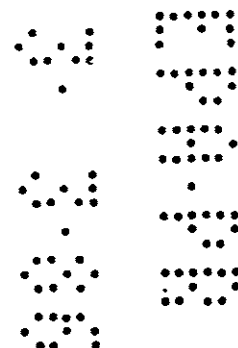


FarmCo Industries, Inc.

A SOUTH DAKOTA CORPORATION

WATERTOWN, SOUTH DAKOTA 57201

USA



FarmCo WOOD TREATMENT (GEL) is a bodied oil-in-water emulsion closely resembling "mayonnaise dressing" in consistency and color. It is composed, by weight, of 9.70% Pentachlorophenol, technical, 80.5% solvents and emulsifiers, and 9.80% water. The product is a semi-stable, highly viscous, self-sustaining emulsion that can be applied to wood surfaces in thicknesses up to one inch or more. The ingredients impart good protection to wood against termites and decay. Soon after the application is made to wood, the Penta in oil starts to penetrate the wood, the water begins to evaporate, and a thin film is formed over the outside of the treatment that protects it until all but the emulsion stabilizers are dissipated into the wood. When this is accomplished, only a thin film remains on the wood, and it ultimately dries up.

Certain statements relative to the packaging of the product and the care of the material in storage and use will help assure trouble-free use of the product. Like many bodied products (such as paint), it is best to keep air from contacting the material when not in use. The containers are filled almost to the top, thus eliminating large air spaces in the original containers. If only a part of the contents of a container is used and the lid is securely refastened on the container, the large air space above the remaining contents may allow the upper part of the FarmCo WOOD TREATMENT (GEL) to become thick. This does not reduce the value of the product, but the total contents remaining in the container should be well mixed by stirring before use. Prolonged exposure of FarmCo WOOD TREATMENT (GEL) to the air will cause some separation of oil from the product. In fact, that is the action designed in the product, and is normal, but is an undesirable action *in the can*. Therefore, DO NOT leave the lid off the can when not in use.

FarmCo WOOD TREATMENT (GEL) can separate if allowed to freeze or if stored in a very hot area. It is best to store the product only in areas where temperatures will range from 40°F. to 80°F. Should the product become separated to the stage where it will not adhere to wood, it can be reconstituted by the addition of small amounts of water and stirring vigorously with a wood paddle. Repeat this procedure as necessary. Do not use a mechanical stirring device.

APPLICATION DATA

FarmCo WOOD TREATMENT (GEL) is applied to wood like butter is spread on bread. The way it is applied will influence the quantity of preservative available to dissipate into the wood. Absorption is influenced by the species and age of the wood. New or moist wood takes up the material slower than old wood, and of course, paint or other films over the wood surface will retard penetration. FarmCo WOOD TREATMENT (GEL) is most useful for the treatment of sills, plates, joists, cuts or studs, other structural members, timber structures and poles and stumps in line.

In the original applications, FarmCo WOOD TREATMENT (GEL) was applied as a continuous coating to wood surfaces, and the treatment obtained was compared with brush and dip applications of Liquid Penta solutions. The results of these tests showed that in Southern Yellow pine 2x8 lumber (flat grain, matched pieces) the following retentions of Penta in pounds per cubic foot were obtained:

FarmCo WOOD TREATMENT (GEL)	1st 1/8"	2nd 1/8"	3rd 1/8"
1/4" coating	1.232	0.860	0.600
1/8" coating	0.896	0.460	0.316
1/16" coating	0.504	0.348	0.320
5% Penta-in-oil			
20 Brush Coats	0.492	0.284	0.092
10 Brush Coats	0.220	0.060	0.048
2 Brush Coats	0.092	0.020	0.004
3 Minute Dip	0.212	0.100	0.056

The retentions at the same depths and when the preservatives were applied in the same way to Douglas Fir showed the same relative results, but with less than one-half as much retention.

More recent studies dealing with applications of FarmCo WOOD TREATMENT (GEL) indicate continuous coatings are not necessary provided the material is applied in such a way that the penta-in-oil can "creep" adequately into the areas to be protected.

It has been found that starting a band of treatment about one inch from the subflooring allows sufficient creep even against gravity to go to the top of the joist. Closer applications to the subfloor may allow the oil to get to the tar paper where it has been used between the floors, and the oils can dissolve the tar from such papers. It has also been found that stopping the band about one inch from the lower edge of the joist will eliminate drip which could occur due to a combination of oil release from the emulsion plus gravity creep.

FarmCo WOOD TREATMENT (GEL) should not be applied so heavily to the lower ends of studs or to the plates as to cause plaster discolor or other undesirable conditions. When one realizes that FarmCo WOOD TREATMENT (GEL) can deliver to a given area a preservative concentration equivalent to about twenty brush coats of liquid formulation, its potential value becomes apparent.

For the preservative treatment of poles or stumps in line, with a brush, trowel, gun or other suitable application device, apply a coating of FarmCo WOOD TREATMENT (GEL) 1/4 inch thick around the ground line area of the pole or stump in a band 18 to 24 inches wide, extending 2 to 6 inches above the ground line and cover the treated area with a suitable plastic coated paper to increase the effectiveness of the treatment. To prevent soil contact with the FarmCo WOOD TREATMENT (GEL) in order to facilitate the complete absorption of the FarmCo WOOD TREATMENT (GEL) by the treated pole or stump in line, it is essential that the plastic coated paper wrap remain in place for a minimum of 72 hours after treatment.

SPILL OR LEAK

Do not touch spilled material. Stop leak and take up spill with absorptive clay or other noncombustible absorbent material. Place in a clean, dry, suitable waste storage container for later disposal. If spill or leak is resultant from a damaged container, transfer remaining product to a suitable properly labeled container and dispose of empty damaged container according to label directions.

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We do not presume to have studied all possible types of mechanical equipment for use with FarmCo WOOD TREATMENT (GEL). To date, the most satisfactory methods of applications have been by caulking gun, brush or trowel, using long cuffed, rubber neoprene gloves to avoid skin contact.

SAFETY MEASURES AND USE PRECAUTIONS

Users of our WOOD TREATMENT products should understand the nature of the products and give careful consideration to the safe handling instructions given herein. This product contains PENTACHLOROPHENOL.

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.

WARNING: KEEP OUT OF REACH OF CHILDREN

May be fatal if swallowed. Do not breathe vapor, dust, or spray mist. Do not get in eyes, on skin or clothing. In case of skin contact, wash immediately with soap and water. Avoid contamination of feed and foodstuffs. If swallowed, drink one or two 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. Get medical attention immediately.

This product is toxic to fish, birds and other wildlife. Do not apply directly to water.

Do not use, pour, spill or store near heat or open flame.

Pentachlorophenol and formulations thereof are irritating to the skin of most individuals and may be absorbed if contact is prolonged beyond five or ten minutes, or if repeated contacts for shorter periods occur. Wear protective clothing and rubber gloves when handling the freshly treated lumber.

Actually, safe handling of WOOD TREATMENT formulations is very simple.

DO NOT SWALLOW

FarmCo WOOD TREATMENT (GEL) should not be taken internally. It should not be placed so that children or animals will get into it, and used containers should not be left where the contents could cause a health hazard.

PROTECT EYES, NOSE, THROAT

Although FarmCo WOOD TREATMENT (GEL) is much easier to use than fluid (liquid) formulations of Pentachlorophenol, it should not be used in enclosed areas without adequate ventilation, and the eyes should be protected with goggles during applications. The worker should be taught to cleanse his face and hands promptly after working with FarmCo WOOD TREATMENT (GEL), to avoid having the material get into sensitive regions such as the eyes, or be absorbed by the skin.

AVOID SKIN CONTACT

FarmCo WOOD TREATMENT (GEL) is irritating to the skin of most individuals, and if it is left in contact with the skin for periods longer than five to ten minutes or is allowed to contact the skin repeatedly for shorter periods, the Pentachlorophenol can be absorbed. This hazard can be avoided by the use of synthetic rubber gloves and other protective garments.

IT IS EASIER TO AVOID TROUBLE THAN CORRECT IT

Users that are accustomed to handling chemicals, take precautions to protect themselves, their workmen and their clients. The above-precautionary measures are reviewed in order to help maintain good records. Simple precautions as given above include washing the exposed body parts with soap and warm water at the completion of a handling operation and the wearing of adequate protective garments. Clothing that becomes contaminated with FarmCo WOOD TREATMENT (GEL) should be changed to avoid skin contamination.

Washing with soap and water should be routine practice before eating, drinking or smoking, and at the close of the working period. It may be advisable at other times, under particular conditions, and should always be practiced in cases of accidental contact. The whole secret of safe handling of Penta preparations is simply to avoid direct physical contact with these.

GENERAL STORAGE PRECAUTIONS

Store in a dry, well ventilated storage room, building or covered area where fire protection is provided. Entire storage facility should be secured by a climb proof fence and doors and gates should be kept locked to prevent unauthorized entry. Store containers with the labels plainly visible. If containers are not in good condition when received, the contents should be placed in a suitable container and properly relabeled. To prevent cross-contamination of other pesticides, fertilizer, food and feed, each pesticide formulation should be segregated. Rigid containers should be stored in an upright position. All containers should be stored off the ground in an orderly way so as to permit ready access and inspection.

6/28/8

ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENTS OF PRACTICAL TREATMENT

RESTRICTED USE:

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

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

Applicators who apply FarmCo WOOD TREATMENT GEL, containing pentachlorophenol, by caulking gun, brush or trowel must wear disposable coveralls or other suitable impermeable protective clothing. Launder non-disposable protective clothing separately from other clothing.

Applicators must not eat, drink, or use tobacco products during those parts of the application process that may expose them to the FarmCo WOOD TREATMENT GEL formulation.

Wash thoroughly after skin contact, and before eating, drinking, use of tobacco products, or using restrooms.

Protective clothing must be changed when it shows signs of contamination. Dispose of worn-out protective clothing and workshoes or boots in any general landfill, in trash, or in any other manner approved for pesticide disposal.

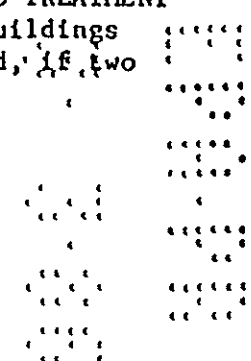
Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for Guidance.

Avoid inhaling vapors. If inhalation of vapors cannot be avoided, applicators must wear a properly fitting, well-maintained half-mask cannister or cartridge respirator which is MSHA/NIOSH-approved for organic vapors and acid gases.

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 FarmCo WOOD TREATMENT GEL to the surface of timber and lumber in the interior living area of a building or home.

Do not apply FarmCo WOOD TREATMENT GEL to wood intended for farrowing or brooding facilities. Do not apply FarmCo WOOD TREATMENT GEL to wood intended 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. FarmCo WOOD TREATMENT GEL 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 will be applied.



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Do not apply to wood intended to be used in a manner in which 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 this product to treat wood intended to be used for cutting-boards or counter tops.

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 to be used where it may come into direct or indirect contact with public drinking water, except for those uses involving incidental contact such as docks and bridges.

Do not use this product to treat wood intended to be used 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.

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 reuse. 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 tightly woven coveralls and gloves which are impervious (e.g., vinyl coated) to the pesticide. Wash exposed skin thoroughly after contact with treated wood, and before eating, drinking or using tobacco products.

Wood which has been treated with this product should be disposed 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.

FarmCo WOOD TREATMENT GEL should not be used to treat wood which will be in frequent or prolonged contact with skin, unless the wood will be treated with an effective sealer.

NOTE TO USER: As used on this label and in this Bulletin, the term "respirators" means properly fitting, well-maintained half-mask canister cartridge respirators which are MSHA/NIOSH-approved for organic vapors and acid gases. Examples of acceptable materials for protective clothing (e.g., overalls, jackets, head covering, boots, disposable coveralls, and gloves) required during application and handling pentachlorophenol are polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, NBR (Buna-N), and nitrile. Urethane, shellac, latex epoxy enamel and varnish are acceptable sealers for wood treated with FarmCo WOOD TREATMENT GEL.

REFER ALSO TO PRODUCT LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

GENERAL AND PACKAGING DATA

Trade Name	FarmCo WOOD TREATMENT GEL
Active Ingredient	Pentachlorophenol, technical, other chlorophenols and related compounds and aromatic petroleum oil
Odor	Pine Oil
Weight per Gallon	7.5 pounds
Packaging	5 gallon drum 1 gallon can (4 to the case) 10.5 ounce caulking cartridge (12 per carton, 48 per case)
Shipping	F.O.B. South Shore, South Dakota

REFER ALSO TO PRODUCT LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

NOTICE OF WARRANTY

FarmCo Industries makes no warranty of merchantability, fitness for any purpose, or otherwise, express or implied, concerning this product or its use, which extend beyond the statements on this label.

- Important Notice**
1. Place cartridge in caulking gun.
 2. Cut off plastic tip to make 1/8" bead.
 3. Puncture seal inside spout.
 4. Always place drip cap firmly on end of spout of partially used cartridge.
 5. Keep from freezing, do not store near heat or open flame.
 6. Store and transport cartridges in upright position.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

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May be fatal if swallowed. Do not breathe vapor, dust or spray mist. Do not get in eyes, on skin or clothing. In case of skin contact, wash immediately with soap and water. Avoid contamination of feed and foodcuffs.

Ventilate treated areas until vapors have dispersed.

Wear protective clothing and PVC, neoprene or Buna-N gloves when handling the freshly treated lumber.

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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame



FarmCo WOOD TREATMENT

GEL

PENETRATING PENTA COATING

RESTRICTED USE PESTICIDE; FOR SALE AND USE ONLY BY CERTIFIED APPLICATORS OR BY PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATORS' CERTIFICATION. FOR THE PRESERVATIVE TREATMENT OF POLES AND STUFS IN LINE, TRUSS STRUCTURES, CUTS AND HOLES IN TREATED WOOD, AND EXPOSED TRUSS AND LINGER SURFACES IN BUILDINGS, TO PROTECT AGAINST FUNGUS, DECAY, CARPENTER ANTS, WOOD DESTROYING BEETLES AND TERMITES AND AS A SUPPLEMENTAL TREATMENT FOR TERMITE CONTROL. NOT TO BE USED FOR THE GENERAL TREATMENT OF FINISHED BUILDINGS.

ACTIVE INGREDIENTS:	
Pentachlorophenol	8.59%
Other Chlorophenols & Related Compounds	1.01%
Pine Oil	10.10%
Aromatic Petroleum Solvent	62.85%

INERT INGREDIENTS:	17.35%
Total	100.00%

**KEEP OUT OF REACH
OF CHILDREN
DANGER**

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Drink one or two 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. Get medical attention immediately.

If Inhaled: Remove victim to fresh air and supply respiration if indicated.

If On Skin: Wash promptly with soap and water. Rinse thoroughly.

If In Eyes: Rinse eyes for at least 15 minutes with water and call a physician immediately.

See side panel for additional precautions and directions for use.

EPA Establishment No. 46772-SD-01
EPA Registration No. 46778-Z

10.5 FL. OZ.
(228 GM.)

NET CONTENTS

DIRECTIONS FOR USE

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

REFER TO ACCOMPANYING BULLETIN NO. 1803 FOR COMPLETE USE DIRECTIONS.

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL: PESTICIDE WASTES ARE ACUTELY HAZARDOUS.

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.

General: Consult Federal, State or local disposal authorities for approved alternative procedures.

NOTICE OF WARRANTY

FarmCo Industries makes no warranty of merchantability, fitness for any purpose, or otherwise, express or implied, concerning this product or its use, which extend beyond the statements on this label.

Manufactured by

FarmCo Industries
Watertown South Dakota 57201