61470-3 5/2/2014 1/10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 2 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Micah T. Reynolds
**Technology Sciences Group Inc.**
1150 18th Street, Suite 1000
Washington, DC 20036

Subject: **Coal Tar Creosote P2**
EPA Registration Number: 61470-3
Application Date: February 3, 2014
Receipt Date: February 4, 2014

Dear Mr. Reynolds:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide (FIFRA), as amended, is acceptable.

**Proposed Amendment**

- Label Revision: Correcting Label Statements and Errors

**General Comments**

A stamped accepted label is enclosed for your records. This labeling supersedes all previous labeling. The next printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed label before selling or distributing the product bearing the revised labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 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 it's implementing regulation at 40 CFR 152.3.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at hardy.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 308-6440 or by email at grigsby.stacey@epa.gov . When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Jacqueline Hardy
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

**Enclosure: stamped label**

**RESTRICTED USE PESTICIDE**
Due to chronic toxicity in animal studies
For 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.

# COAL TAR CREOSOTE P2

FOR PRESSURE TREATMENT OF WOOD

| | |
|---|---|
| **Active Ingredient:** | |
| **Coal Tar Creosote (AWPA P2)** | **98.0 %** |
| **CAS No. 8001-58-9** | |
| **Inert Ingredients** | **2.0 %** |
| **Total** | **100.0 %** |

## CAUTION

See [side] [back] [other] panel for [additional precautionary statements], [First Aid], [and complete Directions for Use]

**EPA Reg. No. 61470-3**
**EPA Est. No. 81091-CAN-001**

Net contents_____ gallons

**Manufactured by:**
RUETGERS Canada Inc.
725 Strathearne Avenue North
Hamilton L8H 5L3
Canada

ACCEPTED
MAY 2 2014
Under the Federal Insecticide, Fungicide, and Rodenticide, Act as amended, for the pesticide, registered under EPA Reg. No. 61470-3

| FIRST AID | |
|---|---|
| If in eyes | • Hold eye open and rinse slowly and gently with water for 15-20 minutes.<br>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.<br>• Call a poison control center or doctor for treatment advice. |
| If swallowed | • Call poison control center or doctor immediately for treatment advice.<br>• Do not induce vomiting unless told to do so by the poison control center or doctor.<br>• Do not give anything by mouth to an unconscious person. Do not give any liquid to the person. |
| If on skin or clothing | • Take off contaminated clothing.<br>• Rinse skin immediately with plenty of water for 15-20 minutes.<br>• Call a poison control center or doctor for treatment advice. |
| If inhaled | • Move person to fresh air<br>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.<br>• Call a poison control center or doctor for further treatment advice. |
| **HOTLINE NUMBER** | |
| Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information. | |
| **NOTE TO PHYSICIAN** | |
| Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia. | |

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear protective eye wear (goggles, protective glasses, or face shield). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 $mg/m^3$ OSHA PEL (* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possibly changes in liver, thyroid and blood elements.

See [side] [other] panel for additional precautions and First Aid.

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## PERSONAL PROTECTIVE EQUIPMENT (PPE)

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety work boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety work boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

## USER SAFETY REQUIREMENTS

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

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 material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, and smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

## USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

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

For terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/cross arms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior/outdoor uses only.

## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

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Post-Treatment Procedures:

Creosote-treated wood intended for use in aquatic or marine environments must be processed using one of the following alternative procedures, as determined by the treater:

- **Expansion Bath** – Following the pressure period, creosote should be heated from 10 - 20 degrees F. above press temperatures (consistent with the preservative and species temperature limitations set by AWPA) for a minimum of one hour. Pump creosote back to storage and apply a minimum vacuum of 22 inches of Hg (adjusted for location elevation) for a minimum of two hours.

- **Steaming** – Following the pressure period, and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of two hours at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and steam for two hours for lumber and timbers and three hours for round piling. Maximum temperature during this process should not exceed 240 degrees F. Apply a second vacuum for a minimum of four hours at 22 inches of Hg (adjusted for location elevation).

- **Double Vacuuming** – Following the pressure period and after the creosote has been pumped back to the work tank, a vacuum must be applied for a minimum of one hour at not less than 22 inches of Hg (adjusted for location elevation) to recover excess preservative. Release vacuum back to atmospheric pressure and then follow with a second vacuum of not less than 22 inches of Hg (adjusted for location elevation) for a minimum period of three hours.

Ventilation Process (at conclusion of treatment) to be put in place as of December 31, 2013:

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.

- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.

- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.

- After ventilation is complete, the cylinder door may be completely opened.

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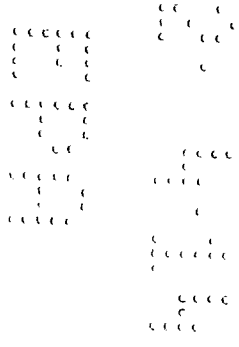
## STORAGE AND DISPOSAL

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

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. A RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide 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.

(Note to reviewer: Container handling instructions are not required for transport vehicles by 40 CFR 156.140(e) and 156.144(g).)



Supplemental Labeling for Creosote (P2)
**EPA Reg. No. 61470-3**

Creosote (P2) is registered only for pressure treatment of wood. Wood treaters must not knowingly pressure treat wood commodities that are not encompassed by the following use category table, which provides examples from the American Wood Protection Association (AWPA) Use Category System, as set forth in the most current edition of the AWPA Book of Standards.

| **AWPA Commodity Specification: Crossties and Switch Ties** | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC 4A, 4B, and 4C | Crossties and Switch Ties, produced from all wood species recognized by AWPA for this commodity. Manufactured to meet AWPA specifications. |

| **AWPA Commodity Specification: Posts** | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC4A | Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing |
| UC4B | Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage<br>Posts, round, 1/2 and 1/4 round for building construction<br>Round posts, for structural members in agricultural uses |

| **AWPA Commodity Specification: Poles** | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC 4A, 4B, and 4C | Utility poles (including laminated)<br>Poles for highway and agricultural construction, lighting, building structural use |

Note: poles may be glue-or mechanically-laminated

| **AWPA Commodity Specification: Piling** | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC 4C | Foundation and Land & Fresh Water Piles |

| AWPA Commodity Specification Marine: (Salt Water/Brackish Water) Applications | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC 5A, 5B, and 5C | Bulkhead sheathing<br>Lumber/timbers use, including timbers, cross bracing, and highway construction<br>Piles for marine applications<br>Plywood for bridge and marine construction |

| AWPA Commodity Specification: Sawn Products | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC 1, 2, and 3B | Guardrails for highway construction, including for golf course bridges meeting highway construction standards |
| UC4A | Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards<br>Cross arms<br>Fence rail (farm/agricultural only, round, ¼ round, ½ round) |
| UC4B | Highway bridge decking (above ground, structural, subject to critical/severe decay)<br>Road salt/brine storage<br>Highway construction materials, including cribbing, lighting<br>Piles (structural support in residential or business construction)<br>Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use<br>Poles for structural building use<br>Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures<br>Lumber/ Timbers (2 x 8 inch and/or 3 x 6 inch or greater) for marine use (out of water, ground contact, including salt water splash zone) |
| UC4C | Piles for structural support |

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| AWPA Commodity Specification: Wood Composites | |
|---|---|
| **AWPA Use Category** | **Commodity Examples** |
| UC 1, 2, and 3B | Composite lumber for structural uses<br>Glue- or nail-laminated structural members<br>Plywood for agriculture, and farm use |
| UC 4A | PSL & LVL composite lumber for highway construction members (laminates)<br>Plywood for bridge and farm/agricultural use |
| UC 4B | Plywood for marine use in salt water splash zones<br>Plywood for road salt/brine storage, highway construction materials<br>Composite lumber for bridge and highway construction<br>Glue-laminate members (important structural or saltwater splash) |
| UC4C | Composite (PSL & LVL) lumber highway structural use<br>Members (laminates) for critical structural uses |

Note: laminates can be glued or mechanically fastened
Note: PSL = parallel strand lumber, LVL = laminated veneer lumber