



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 18, 2024

Rodica Romanovschi  
Rain CII Carbon, LLC  
1330 Greengate Drive, Suite 300  
Covington, LA 70433  
Electronic Transmittal: Rodica.Romanovschi@raincarbon.com

Subject: Label Amendment – Registration Review Interim Decision Label Mitigation  
Product Name: P3 Creosote-Petroleum Solution  
EPA Registration Number: 61470-4  
Received Date: 8/3/2022  
Decision Number: 586486

Dear Rodica Romanovschi:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, 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.

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 Creosote Interim Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. 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. See FIFRA section 2(p)(2). 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) list 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, FIFRA section 12(a)(1)(B). 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 the chemical review manager for creosote, Peter Bergquist, by phone at 202-566-0648, or via email at [bergquist.peter@epa.gov](mailto:bergquist.peter@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Wilson".

Kimberly Wilson, Senior Environmental Protection Specialist  
Antimicrobials Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
[wilson.kimberly@epa.gov](mailto:wilson.kimberly@epa.gov)  
202-566-0647

Enclosure: Stamped Label

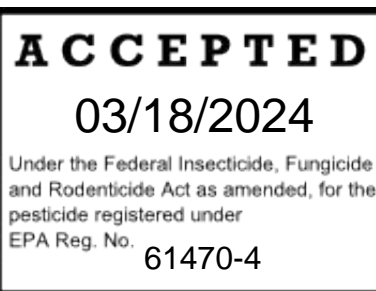
**RESTRICTED USE PESTICIDE**

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.

# P3 CREOSOTE-PETROLEUM SOLUTION

(Alternate Brand Name: Coal Tar Creosote AWPA P3)

FOR PRESSURE TREATMENT OF WOOD



**Active Ingredient:**

**Coal Tar Creosote (AWPA P1/P13) 75.0 %**  
**CAS No. 8001-58-9**

**Inert Ingredients\* 25.0 %**

**Total 100.0 %**

\*Contains Petroleum Distillates

## CAUTION PRECAUCIÓN

“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).”

**EPA Reg. No. 61470-4**

**EPA Est. No.**

Net contents \_\_\_\_\_ gallons

(Lot or Batch Number: may appear written on label or accompanying shipping information.)

**Manufactured [by] [for]:**

Rain CII Carbon, LLC  
1330 Greengate Drive, Suite 300  
Covington, LA 70433

## FIRST AID

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person. Do not give any liquid to the person.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>

## HOTLINE NUMBER

Have the product label or SDS with you when calling a poison control center or doctor, or going for treatment. You may also contact GBK at 1-800-535-5053 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 substantial but temporary eye injury. Harmful if swallowed, absorbed through skin, or inhaled. Avoid breathing vapors of heated material. 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<sup>3</sup> OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure without appropriate personal protective equipment (PPE) 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.

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

All personnel handling treated wood or handling treating equipment (including: working or conducting external repairs to equipment within 50 ft of an open cylinder door or a treated charge within 60 minutes following treatment, during manual or automatic door-spacer placement and operating transfer decks or open-cab wood movers); and when retrieving a lead cable from the interior of a cylinder and connecting it to a loader or transfer deck mechanism for extraction of the charge; must wear the following PPE:

- Long sleeve shirts and long pants,
- Chemical-resistant gloves covering the entire hand and wrist without cloth or mesh backings, composed of polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, or NBR (Buna-N);
- Socks plus industrial-grade safety boots with chemical-resistant soles.
- A minimum of a NIOSH-approved, properly fitting elastomeric half mask respirator (PF10) with organic vapor (OV) cartridges and combination R or P filters; OR a NIOSH-approved gas mask with OV canisters; OR a NIOSH-approved powered air purifying respirator with OV cartridges and combination HE filters,

All personnel conducting maintenance or repairs on or in any part of the treatment cylinder including cylinder door gaskets, open doors, interior surfaces of the cylinder, and emission points; and/or in the event of equipment malfunction, all personnel located within 50 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- A minimum of a NIOSH-approved, properly fitting elastomeric full-mask respirator (PF50) with organic vapor (OV) cartridges and combination R or P filters; OR a NIOSH-approved gas mask with OV canisters; OR a NIOSH-approved powered air purifying respirator with OV cartridges and combination HE filters;
- Chemical-resistant coveralls;
- Chemical-resistant gloves covering the entire hand and wrist without cloth or mesh backings, composed of polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, or NBR (Buna-N); and
- Socks plus industrial-grade safety boots with chemical-resistant soles.
- 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.

All other personnel working on the drip pad for any task, including cylinder-loader operators and load-out loader operators, except those performing the activities identified above, must wear the following PPE:

- Long sleeve shirts and long pants;
- Chemical-resistant gloves covering the entire hand and wrist without cloth or mesh backings, composed of polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, or NBR (Buna-N) (including cylinder-loader operators and load-out loader operators except while operating mobile equipment such as forklifts or front-end loaders); and
- Socks plus industrial-grade safety boots with chemical resistant soles.

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 and drip pad area of the wood treatment facilities.

**Implementation by December 31, 2024:** specific to control rooms isolation and bridge rail replacement only. Control Rooms must be isolated from cylinders and drip pad areas. For facilities treating above ambient temperature, if the control room is located less than 50 feet of either the cylinder door or the exhaust pipe, either (a) the air to the control room must be supplied from an external source (located more than 50 feet from the cylinder door or the exhaust pipe) or (b) the air to the control room must be filtered to reduce organic contaminants. The air filtration system technology must be rated to remove organic vapors from the air entering the control room and replaced according to product specifications.

**NOTE TO USER:** As used on this label, the term "respirators" means properly fitting, well-maintained, half-mask canister or cartridge respirators which are National Institute for Occupational Safety and Health (NIOSH) approved for organic vapors and acid gases. Chemical-resistant clothing such as coveralls and gloves must be composed of polyvinyl acetate (PVA), polyvinyl chloride (PVC), neoprene, or NBR (Buna-N)."

## RESPIRATOR FIT TESTING – MEDICAL QUALIFICATION, AND TRAINING

Using a program that conforms to Occupational Safety and Health Administration's (OSHA) requirements (see 29CFR Part 1910.134), employers must verify that any handler who uses a respirator is:

- Fit-tested,
- Trained, and
- Examined by a qualified practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations, such as a physical exam, might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be reexamined by a qualified medical practitioner if their health status of respirator style or use-conditions changes.

Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with these requirements.

## 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 RESTRICTED USE PESTICIDE

**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 piles/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.

**P3 Creosote – Petroleum Solution** is registered only for pressure treatment of wood products that are intended for exterior/outdoor use. Not for treatment of wood to be used in residential settings. The American Wood Protection Association (AWPA) has established standards (AWPA Book of Standards, 2022) for creosote pressure treatment of the wood commodities listed in the table included in the Supplemental Labeling accompanying this product.

## TARGET GUIDELINES

The maximum application rate for this product (treating solution strength) is 100%. The table below sets forth minimum target retentions for the active ingredient (P3) in pounds per cubic foot (pcf) for each commodity type. Certain wood species are difficult to treat and may refuse to achieve retention targets below (treatment to refusal).

Commodity Specification	Minimum Target Active Retention (pcf)
Sawn Products	3
Posts	4
Poles	5
Piling (Foundation and Fresh Water)	3
Wood Composites	3
Crossties and Switch Ties	3
Marine: (Salt Water/Brackish Water) Applications	8

## APPLICATION

### Engineering Controls:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Automatic methods that do not require hand-contact 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 50 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.

## 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 pressure temperature consistent with the preservative and species temperature limitations set by industry standards and commonly accepted industry practices 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 not less than 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:

- 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 3 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 must 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 an automatic 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 without the proper PPE may be located within 50 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.
- Automatic methods that do not require hand-contact must be used to place/remove bridge rails
- After treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

### **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. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards and treated before disposal in an approved landfill, as 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 P3 Creosote-Petroleum Solution**  
**EPA Reg. No. 61470-4**

P3 Creosote-Petroleum Solution is registered only for pressure treatment of wood. Not for treatment of wood to be used in residential settings. The American Wood Protection Association (AWPA) has established standards (AWPA Book of Standards, 2022) for creosote pressure treatment of the wood commodities listed in the following table:

<b>Sawn Products</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC 1, 2, and 3B Above ground exterior – uncoated, poor water runoff	Guardrails for highway construction, including for golf course bridges meeting highway construction standards
UC4A Ground contact, fresh water – general use	Lumber/timber for highway construction, including for golf course bridges meeting highway construction standards Cross arms Fence rail (farm/agricultural only, round, ¼ round, ½ round)
UC4B Ground contact, fresh water – heavy duty use	Highway bridge decking (above ground, structural, subject to critical/severe decay) Road salt/brine storage Highway construction materials, including cribbing, lighting Piles (structural support in business construction) Posts (sawn 4 sides) for highway construction, farm/agricultural structural use, spacer blocks, important building structural use Poles for structural building use Lumber/timbers (5 inches or greater) structural use; highway construction and cribbing; retaining walls for highway uses; building support structures 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 Ground contact, fresh water – extreme duty use (critical structure)	Piles for structural support

<b>Posts</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC4A Ground contact, fresh water, general use	Posts, round, 1/2 and 1/4 round for highway construction (including guide, sign and sight) and farm fencing
UC4B Ground contact, fresh water – heavy duty use	Posts, round, 1/2 and 1/4 round for highway construction (including guardrail posts, spacer blocks) and for road salt/brine storage Posts, round, 1/2 and 1/4 round for building construction Round posts, for structural members in agricultural uses

<b>Poles</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C Ground contact, fresh water – heavy duty use	Utility poles (including laminated) Poles for highway and agricultural construction, lighting, building structural use

Note: poles may be glue-or mechanically-laminated

<b>Piling</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC 4C Ground contact, fresh water – extreme duty use (critical structural)	Foundation and Land & Fresh Water Piles

<b>Wood Composites</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC1,2 and 3B Above ground, exterior - uncoated, poor water runoff	Composite lumber for structural uses Glue- or nail-laminated members Plywood for agriculture, farm use
UC4A Ground contact, fresh water- general use	PSL & LVL composite lumber for highway construction Members (laminates) Plywood bridge and farm/agricultural use
UC4B Ground contact, fresh water- heavy duty use	Plywood for marine use in salt water splash zones Plywood for road salt/brine storage, highway construction materials Composite lumber for bridge and highway construction Glue-laminate members (important structural or saltwater splash)
UC4C Ground contact, fresh water- extreme duty use (critical structural)	Composite (PSL & LVL) lumber highway structural use Members (laminates) for critical structural uses

Note: Laminates can be glued or mechanically

Note: PSL = parallel strand lumber, LVL = laminated veneer lumber

<b>Crossties and Switch Ties</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC 4A, 4B, and 4C Ground contact, fresh water – extreme duty use (critical structural)	Crossties and Switch Ties, produced from all wood species

<b>Marine: (Salt Water/Brackish Water) Applications</b>	
<b>Use Category</b>	<b>Commodity Examples</b>
UC 5A,5B and 5C Marine use Salt or brackish water and adjacent mud zone	Bulkhead sheathing Lumber/timbers use, including use cross bracing, highway construction Piles for marine applications Plywood for marine construction, boat building