



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 9, 2008

Julie Ownbey
Regulatory Specialist
Arch Wood Protection, Inc.
1955 Lake Park Drive, Suite 100
Smyrna, GA 30080

Subject: **Arch Dricon® Fire Retardant**
EPA Registration Number: 62190-9
Application Dated: May 12, 2008
Receipt Date: May 15, 2008

Dear Ms. Ownbey:

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

Proposed amendment:

- Label revision

General comments:

The Agency is moving away from review of paper submitted registration applications to electronic review of applications. Therefore, we need your help to make this an efficient and convenient process for both you and the Antimicrobials Division. Accordingly, we are asking you to submit future labeling amendments for this product via the electronic labeling process. Refer to the following website for guidance on electronic submissions, including label:

http://www.epa.gov/oppfead1/eds/esr_guidance.htm#overallsub. If you have any questions concerning electronic label submissions, a list of contacts is available at the following website: <http://www.epa.gov/oppfead1/eds/edsgoals.htm#contacts>.

Other Comments

A stamped copy of the label is enclosed for your records.

Should you have further questions concerning this letter, please contact me by telephone at (703) 308-6422 or by e-mail at heyward.adam@epamail.epa.gov or Lisa McKelvin by telephone at (703) 308-7496 or by email at mckelvin.lisa@epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

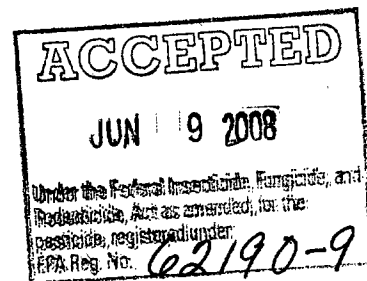
Sincerely,

Lisa R. McKelvin

Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: [Stamped label]

ARCH DRICON® Fire Retardant



ACTIVE INGREDIENT:

Boric Acid	26.3%
INERT INGREDIENTS	73.7%
TOTAL.....	100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

See First Aid Statement below and side panel for Precautionary Statements.

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a Poison control center or doctor immediately for treatment advice.
- Have person sip glass of water if able to swallow.
- Do not induce vomiting unless told to do so by poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have the MSDS or label with you when calling a poison control center or doctor, or going for treatment.

FOR MEDICAL EMERGENCIES: 1-800-654-6911 or 423-780-2970

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed, absorbed through the skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing dust. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants,
- Socks and shoes
- Goggles or face shield.
- Chemical-resistant gloves made of any waterproof materials

User Safety Requirements and Recommendations:

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/ maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Wash clothing thoroughly and put on clean clothing. User should remove personnel protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible wash thoroughly.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Keep out of any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes. 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 Pollutant 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. This is a nonrefillable container. Do not reuse this container. Offer for recycling if available.

STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal. **PESTICIDE STORAGE:** Store in a cool, dry place in closed original container. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal or 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 the sack by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of in a sanitary landfill or by incineration if allowed by State and local authorities. **IN CASE OF SPILL:** Shovel or sweep material into container for reuse or disposal in accordance with applicable laws.

READ "LIMIT OF WARRANTY AND LIABILITY" BEFORE BUYING OR USING. IF SUCH TERMS ARE NOT ACCEPTABLE, RETURN AT ONCE UNOPENED.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read "Limit of Warranty and Liability" before buying or using. If such terms are not acceptable, return at once unopened. Contents for use only in pressure-treating forest products. To be used only in the pressure impregnation of forest products utilizing water solutions having concentrations ranging from 7 to 22 percent by weight. Impregnation procedures must rigidly adhere to the current specifications of Arch Wood Protection and/or those of the American Wood-Preservers' Association. Pressure treatment of forest products with DRICON® fire retardant provides wood with protection against termites and decay producing fungi. This product is toxic to termites of the Reticulitermes genus but etching of treated wood may occur.

LIMIT OF WARRANTY AND LIABILITY

This company warrants that this material conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the directions for use. This product is sold subject to the understanding that the buyer assumes all risks of use or handling of this material not in strict accordance with the directions given here with which are beyond the control of the seller, such as, for example, incompatibility with other products and the manner of its use of application. NO OTHER EXPRESSED OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY IS MADE. The exclusive remedy of the buyer, and the limit of liability of this company or any other seller for any and all losses, injuries or damages resulting from the use or handling of this product shall be the purchase price paid by the user or buyer for the quantity of this product involved. The buyer and all users are deemed to have accepted these terms of this notice which may not be varied by any verbal or written agreement.

Arch Wood Protection Inc.,

1955 Lake Park Drive, Suite 250,

Smyrna, GA 30080 ACEAN 24-hr. Emg. Resp. 800-654-6911

EPA Reg. 62190-9 EPA Est. No. 62190-IN-001

NET CONTENTS: 2,000 POUNDS

Made in USA

