PM 19 62719-77

APR 15 1996

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Dr. Kenneth D. Racke DowElanco 9330 Zionsville Road Indianapolis, Indiana 46268-1054

Subject: Revised Labeling--Physical or Chemical Hazards; Directions for Use Lentrek 6WT EPA Registration Number 62719-77 Your Application Dated January 23, 1996

Dear Dr. Racke:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable provided that you make the labeling changes indicated below before you release the product for shipment bearing the amended labeling:

Revise the direction for In-Place Treatment of Utility Poles and Fence Posts to read as follows:

Preventative Treatment: For the preventative control of termites when placing a pole or post in service, use a 1% to 2% dilution. After pole or post hole has been dug, mix the dilution with the soil as it is being replaced to a depth of approximately 10 inches. Place pole or post on top of this layer. Mix the remaining soil fill with treatment solution while back-filling the hole. The treated soil zone around the post or pole should be approximately 6 inches wide.

Remedial Treatment: To control existing infestations of termites or to prevent infestation of poles and posts already in place, use a 1% to 2% dilution. The solution should be injected into termite galleries or channels in the wood. For maximum protection, injections sites should be at or below ground level. Poles and posts may also be treated by rodding down to the base. Rod holes should be placed approximately 3 inches away from the pole and about 6 inches apart. Inject approximately 12 fluid ounces of dilution per foot of depth into each rod hole.

It may be appropriate to use one or both treatment techniques depending upon the specific circumstances at the work site (such as soil type). Retreatment may be made any time there is evidence of reinfestation, disruption, or loss of the barrier due to construction, excavation, landscaping, etc. Annual retreatment is prohibited unless reinfestation or barrier disruption has occurred.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,

DHE.

Dennis H. Edwards, Jr. Product Manager (19) Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

A1A/Lentrek 6 WT/Amendment/01-17-96 file: 1077095d.doc

Lentrek* 6 WT

EPA Reg. No. 62719-77

Registration Notes

Current label text is based on EPA-accepted copy dated February 7, 1989, and the changes submitted by notification 10/27/94.

Proposed Amendments:

- 1. Revised sale copy.
- 2. Physical or Chemical Hazards revised to be consistent with 40 CFR 156.10: The word "Combustible" was deleted as it is not required for a formulation with a flashpoint within the range of 80°F and 150°F. The corrected statement now reads "Do not use or store near heat or open flame."
- Revised and clarified Directions for Use as follows: (1) Added "General Information"; (2) Added "Handling Procedures"; (3) Expanded dilution table; (4) Added "Tank Mixing" section; (5) Clarified application directions; (6) deleted option of tank mixing with creosote; (7) added directions for remedial treatments.

ACCEPTED whb COMMENTS in EPA Letter Dated

APR 1 5 1996

Under the Federal Insecticide, Fungicide. and Rodenilcide Act as amended, for the pueticide registered under SPA Bag. No. 627/9-77

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(Base label):

(logo) DowElanco

Lentrek* 6 WT

For control of wood-infesting insects in lumber, logs, and other wood products.

Active Ingredient:	
chlorpyrifos: O,O-diethyl O-(3,5,6-	
trichloro-2- pyridinyl)	
phosphorothioate	. 62.5%
Inert Ingredients	
Total	100.0%

Contains 6 pounds of chlorpyrifos per gallon.

Precautionary Statements

Hazards to Humans and Domestic Animals Keep Out of Reach of Children WARNING AVISO

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

May Be Fatal If Swallowed Or Absorbed Through Skin • Causes Eye Irritation • May Cause Skin Irritation

Do not get in eyes, on skin, or on clothing. Avoid breathing vapors. Handle concentrate in a ventilated area. Wear protective clothing such as long-sleeved shirt, long-legged pants, hat, rubber gloves, and footwear impervious to aromatic solvents, (i.e. neoprene or nitrile butadiene rubber). Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse. Keep away from food, feedstuffs, and water supplies.

First Aid

If swallowed: Call a physician or Poison Control Center immediately. Do not induce vomiting. Contains an aromatic petroleum solvent. Do not give anything by mouth to an unconscious person.

If on skin: Immediately wash with plenty of soap and water. Get medical attention.

If in eyes: Flush with plenty of water for 5 minutes. Get medical attention.

If inhaled: Remove to fresh air if symptoms of cholinesterase inhibition appear and get medical attention immediately.

Note to physician: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate significance of exposure (baseline) data are useful). Atropine, only by injection, is the preferable antidote. Oximes, such as 2-PAM/protopalm, may be therapeutic if used early; however, use only in conjunction with atropine. In case of severe acuted is poisoning, use antidote immediately after establishing an open airway and respiration.

Environmental Hazards

This pesticide is toxic to birds and wildlife, and extremely toxic to fish and aquatic organisms. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high

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water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Cover or incorporate spills. Do not contaminate water by cleaning of equipment or disposal of waste.

Physical or Chemical Hazards

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

Refer to label booklet for additional precautionary information and Directions for Use.

Notice: Read the entire label. Use only according to label directions. Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies" inside label booklet.

In case of emergency endangering health or the environment involving this product, call collect 517-636-4400.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

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EPA Est. 464-MI-1

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Specialty Insecticide

Net Contents XXX

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(Datapack cover):

(logo) DowElanco

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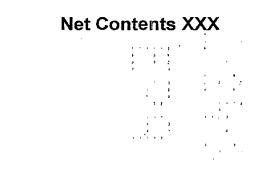
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Specialty Insecticide



(Page 1 through end):

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Environmental Hazards

This pesticide is toxic to birds and wildlife, and extremely toxic to fish and aquatic organisms. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Cover or incorporate spills. Do not contaminate water by cleaning of equipment or disposal of waste.

Physical or Chemical Hazards

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

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Do not formulate this product into other end-use products.

Storage and Disposal

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

Storage: Store in original container in secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Do not store above 100°F for extended periods of time. Storage below 23°F may result in formation of crystals. If product crystallizes, store at 72° to 90°F and agitate 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 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.

Metal 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.

Plastic Container Disposal: Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Reusable Portable Containers: Do not rinse or put any other material into container. When returning reusable portable container, seal all openings and return to collection point designated by DowElanco.

— Mixing and Application Directions

Treatment of Preconstruction Lumber

General Information

Lentrek* 6 WT insecticide can be diluted with suitable base oil. Wear protective clothing such as longsleeved shirt, long-legged pants, hat, rubber gloves and footwear impervious to aromatic solvents, i.e., neoprene or nitrile butadiene rubber, during preparation of solution, treatment, and when handling freshly treated wood. To prepare the solution, dilute Lentrek 6 WT as shown in the following dilution chart.

Gallons of	Gallons of Lentrek 6 WT to Use		
Mixture Desired	0.5% Spray	1.0% Spray	
Light Oil-Based			
Solution			
50	0.35	0.70	
100	0.70	1.40	
250	1.75	1.50	
500	3.50	7.00	
1000	7.00	14.00,,,,,	

<u>Dilution Chart</u>

Directions For Application

To protect unseasoned or seasoned lumber from wood destroying insects, such as termites, carpentier ants and beetles (ambrosia, powder-post, old house borers and others), totally treat the wood with up to 1.0% dilution of chlorpyrifes. This dilution can be applied by various methods including erraying, brushing, dipping or pressure treatment. Frequent monitoring of dip and pressure systems is not costary to insure that the desired level of chlorpyrifes is maintained. Wear protective slothing such as long-sleeved shirt, long-legged pants, hat, rubber gloves and footwear impervious to aromatic solvents, i.e. neoprene or

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nitrile-butadiene-rubber, during preparation of solution, treatment, and when handling freshly treated wet wood. Following treatment, wood can be safely handled when dry.

1. Dip Treatment: Rates of 0.5% to 1.0% are recommended for dip treatments to insure adequate retention. The wood should be totally submersed in the dilution until thoroughly wet and then allowed to dry in a suitable location. Dipping solutions to which Lentrek 6 WT has been added should be agitated before use if left unused for long periods of time. Sediment, debris and other deposits should be periodically cleaned from tank.

2. Pressure Treatment: Rates of 0.25% to 0.5% are recommended for adequate penetration and retention. After the pressure is released and the system drained, the wood should be placed in a suitable location for drying.

3. Spray Treatment or Brush Treatment: Rates of 0.5% to 1.0% are recommended for spray and brush treatments. The wood, including back and ends, should be sprayed or brushed thoroughly with the treatment mixture.

4. Lentrek 6 WT can be diluted with creosote. Rates of 0.5% to 1.0% are recommended. To prepare the solution, dilute Lentrek 6 WT as shown in the following dilution chart. Read and carefully follow all applicable directions, restrictions and precautions on labeling for creosote products used in combination with Lentrek 6 WT.

Dilution Chart

Gallons of Creosote	Gallons of Lentrek 6 WT to Use	
Mixture Desired	0.5% Spray	1.0% Spray
1000	8	16
5000	40	80
10000	80	160

General Information

Lentrek* 6 WT insecticide can be diluted with suitable cils (such as mineral spirits) to protect lumber, logs, pallets, poles, posts, wooden containers, and processed wood products (such as chips and composite materials) from insect attack. Lentrek 6 WT is not miscible in water. Applications may be made by dipping, brushing, spraying, or by pressure treatment. For longer control use the higher use rates and/or apply by pressure treating.

Wood destroying insects are often very small. Therefore complete coverage of the wood product is essential for optimal control. Application by dipping, spraying, or brushing is a surface treatment. Milling or cutting surface treated wood may expose unprotected wood for insect attack. Where control of wood rotting or staining organisms is desired, an appropriate fungicide will need to be added to the treatment solution or applied separately.

Handling Procedures

Wear protective clothing including eye protection, chemically resistant gloves, and footwear impervious to aromatic solvents (such as neoprene or nitrile butadiene rubber) during preparation of solution, treatment, and when handling freshly treated wood.

To avoid breathing spray mist during application in confined areas wear a mask or respirator of a type recommended by NIOSH for filtering spray mists.

Wood can be safely handled without the use of protective clothing when dry. Refer to respective safety information concerning handling precautions for cobiocides and/or solvents.

Mixing Directions

Dilute Lentrek WT with a suitable oil according to Table 1. Agitate during filling to ensure uniform mixing.

Table 1 - Dilution	Chart		•			
Gallons of Mixture	Gallons of Lentrek WT nee		Gallons of Lentrek WT needed for Oil-Based Mix [†]			
Desired	0.25%	0.5%	1.0%	2.0%		
<u>50</u>	<u>0.15</u>	0.3	<u>0.6</u>	1.1		
<u>100</u>	<u>0.3</u>	· <u>0.6</u>	<u>1.1</u> .	<u>2.2</u>		
<u>250</u>	<u>0.7</u>	<u>1.4</u>	<u>2.8</u>	<u>5.5</u>		
<u>500</u>	<u>1.4</u>	<u>2.8</u>	<u>5.5</u> ·	<u>11.0</u>		
1000	· 2.8	5.6	11.0	22.0		

¹Assumes oil weighs 6.5 lb/gallon. Adjust dilution appropriately for the oil you are using.

<u>Tank Mixing</u>

Unless prohibited by a product's label, users can tank mix pesticides currently labeled for similar use patterns. It is always recommended that a small jar compatibility test using proper proportions of chemicals be run to check for chemical compatibility prior to tank mixing.

Directions For Application

To control wood infesting insects such as termites, carpenter ants, ambrosia beetles (*Scolvtidae*), powderpost beetles (*Lyctidae*), false powder-post beetles (*Bostrichidae*), deathwatch beetles (*Anobiidae*), oldhouse borers (*Cerambycidae*), and others treat the wood with up to a 1% dilution of chlorpyrifos. Monitoring of the treating solution may be necessary to insure that the desired level of chlorpyrifos is maintained, particularly where the treating solution may be used for an extended time period.

Dip, spray, and brush treatments are intended to kill localized infestations of workers and winged reproductive forms of termites and to prevent infestation for a temporary period. These applications are not intended as a substitute for soil or pressure treatments.

Dip Treatment

Beetles, wood-infesting ants, and termites may be controlled in freshly cut lumber, wooden containers, millwork, pallets, and processed wood products by dipping. Use rates up to 1%. Rates of 0.5% to 1% are recommended to ensure residual protection. The wood should be totally submerged in the dilution until thoroughly wet (minimum 3 minutes) and then allowed to dry in a suitable location. Dipping solutions should be monitored to ensure the desired level of chlorpyrifos is maintained. Dipping solutions should be agitated if left unused for a period of time (such as overnight). For optimal performance and economy, avoid heavy buildup of wood debris in dip tanks as chlorpyrifos may bind to the debris and thus reduce the strength of the dilution.

Spray Treatment and Brush Treatment

Beetles, wood-infesting ants, and termites may be controlled in lumber, logs, wooden containers, millwork, poles, posts, and processed wood products by spraying or brushing. A 0.5% to 1% dilution is recommended for maximum efficacy. The wood should be sprayed or brushed thoroughly, inclucing backs and ends, with the treatment mixture. Apply to surfaces, voids, and channe's where insects may be located. When spraying, use a sprayer capable of delivering a coarse, low pressure (about 20 psi) spray. On logs, ensure thorough bark coverage as untreated areas are subject to insect attack. When treating processed wood products Lentrek may be sprayed onto wood chips or mixed with a compatible adhesive. The Lentrek and adhesive mixture may be applied by methods suitable for application of the achesive (such as spraying, rollers, or blending). Test compatibility and application method on a small scale prior to full scale production.

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Pressure Treatment

For maximum, long-term control of beetles, wood-infesting ants, and termites in lumber, wooden containers, millwork, pallets, processed wood products, utility poles, and fence posts, apply by pressure treatment. Combine with an appropriate fungicide for control of wood-decay organisms. Treat to attain a minimum retention of 0.0175 pounds per cubic foot (pcf) in the appropriate assay zone. Depending upon the treatment process this usually requires a 0.25% to 1% dilution. Use the lower concentrations for full-cell treatments and higher concentrations for empty-cell treatment.

In-Place Treatment of Utility Poles and Fence Posts

Remedial Treatement: To control existing infestations of termites or to prevent infestation of poles and posts already in place, use a 1% to 2% dilution. The solution should be injected into termite galleries or channels in the wood. For maximum protection, injection sites should be at or below ground level.

Retreatment may be made any time there is evidence of reinfestation. Annual retreatments are prohibited unless reinfestation has occurred.

Warranty Disclaimer

DowElanco warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. DowElanco MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by buyer.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at DowElanco's election, one of the following:

- 1. Refund of purchase price paid by buyer or user for product bought, or
- 2. Replacement of amount of product used

DowElanco shall not be liable for losses or damages resulting from handling or use of this product unless DowElanco is promptly notified of such loss or damage in writing. In no case shall DowElanco be liable for consequential or incidental damages or losses.

The terms of the "Warranty Disclaimer" above and this "Limitation of Remedies" cannot be varied by any written or verbal statements or agreements. No employee or sales agent of DowElanco; or the seller is authorized to vary or exceed the terms of the "Warranty Disclaimer" or this "Limitation of Remedies" in any manner.

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