

69850-1

9/22/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 22 2009

Richard Collier
Research Assistant
MLPC International
c/o Landis International, Inc.
P.O. Box 5126
Valdosta, GA 31603-5126

Subject: Notification in Accordance with PR Notice 98-10
MITC Fume™
EPA Registration No. 69850-1
Application Date: August 25, 2009
Receipt Date: August 26, 2009

Dear Mr. Collier:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Label change due to PR Notice 2007-4
- Correction of Brand Name to Methylisothiocyanate (MITC)
- Compliance with RED

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions concerning this letter, please contact Renae Whitaker by telephone at (703) 308-7003 or email address at: whitaker.renae@epa.gov during the hours of 8:00 am to 3:30 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,

A handwritten signature in black ink that reads "ShaRon Carlisle".

ShaRon Carlisle
(Acting) Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

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United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number MLPC International/69850-1	2. EPA Product Manager Dana Friedman <i>Shahn Carlisle</i>	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) MLPC International/Methylisothiocyanate (MITC)	PM# <i>34</i> Reregistration Branch	
5. Name and Address of Applicant (Include ZIP Code) MLPC International c/o LANDIS INTERNATIONAL, Inc. P.O. Box 5126 Valdosta, GA 31603-5126 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of correction of Brand Name and changes to make label compliant with Label Review Manual, PR Notice 2007-4, and Amended RED. Additional information has been added to 'Directions for Use', net contents information has been updated, storage and disposal information has been updated, and a space for batch code information added to label. This notification is consistent with provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to labeling or confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>Fiberboard box</u>
* Certification must be submitted		If "Yes" Unit Packaging wgt. 1.19 lbs No. per container 18 tubes	If "Yes" Package wgt. _____ No. per container _____

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/>
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued Stenciled		<input checked="" type="checkbox"/> Other <u>Incorporated into metal canister</u>

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Lindsey M. Sorensen	Title Research Assistant	Telephone No. (Include Area Code) 229-247-6472
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature <i>Richard H. Collier</i>	3. Title Vice President, Regulatory Department Landis International Inc.	6. Date Application Received (Stamped)
4. Typed Name Richard H. Collier	5. Date 25 August 2009	

DIRECTIONS FOR USE

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

For use as a remedial treatment in large structural timbers such as utility poles, piling, bridge timbers and laminated wood products located out-of-doors. May be applied to areas of timbers where decay is suspected.

For remedial treatment of wooden poles/timbers:

1. Plug the pre-drilled holes immediately after application;
2. Do not treat structures/beams indoors;
3. Do not drill an application hole through seasoning checks to apply product. If the hole intersects a check, plug the hole and drill another. If more than 2 treatment holes intersect an internal void or rot pocket, redrill the holes farther up the pole into relatively solid wood.

Large structural timbers have many different end uses. The groundline area of a 40" circumference standing pole is taken as a guide and example for application of this product.

For interior decay bore a pattern of 4 holes at a 45 degree downward angle to the center of the pole. Minimum hole depth is 12" and maximum depth is 15". For smaller diameter poles or timbers, it will be necessary to increase the boring angle to allow for a 12" deep hole. The first hole could be at the groundline and succeeding holes about 6"-8" higher and rotated 90 degrees from the next lower hole.

1. Always open tin and tubes in an open area.
2. Have both the opening device and tube with active ingredient within arm's reach.
3. Open tin carefully. Place opening device on top of the tube. Remove the cap from the tube.
4. Insert the tube into pre-drilled hole. Then insert the cap into the hole. For poles, it is recommended that the open end of the tube be placed downwards. For other timbers, it may be appropriate to insert with open end up. Plug hole with a tight fitting plug using the precautions of wearing safety goggles and gloves to prevent exposure to the product.
5. Repeat application procedure for each hole.

Dosage Rate: 1 tube (30 grams) per drill hole.

Recommended dosage rate and drilling pattern for standing utility poles:

Pole Circumference in Inches	Number of Tubes Installed and Drilling Pattern
35" or less	3 holes beginning at groundline spaced 120 degrees apart and 6" to 8" higher than the previous hole.
36" to 49"	4 holes beginning at groundline spaced 90 degrees apart and 6" to 8" higher than the previous hole.
50" to 59"	5 holes beginning at groundline spaced 70 degrees apart and 6" to 8" higher than the previous hole.
60" to 70"	6 holes beginning at groundline spaced 60 degrees apart and 4 to 6" higher than the previous hole.
70" to 80"	7 holes. The first 2 at groundline 180 degrees apart and the remaining 5 spaced 60 degrees apart and 4" to 6" higher than the previous hole.
80" to 90"	8 holes. The first 2 at groundline 180 degrees apart and the remaining 6 spaced 50 degrees apart and 4" to 6" higher than the previous hole.
Over 90"	9 holes. The first 2 at groundline 180 degrees apart and the remaining 7 spaced 45 degrees apart and 4" to 6" higher than the previous hole.

RESTRICTED USE PESTICIDE DUE TO HIGH ACUTE TOXICITY

For retail 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.

MLPC

Methylisothiocyanate (MITC)

CAS NO. 556-61-6
FUNGICIDE FOR WOOD

Active Ingredient:

Methylisothiocyanate 97.00%

Inert Ingredients..... 3.00%
100.00%

KEEP OUT OF REACH OF CHILDREN



**DANGER
POISON
FLAMMABLE
FIRST AID**



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

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

IF IN EYES: Hold eye open and rinse slowly and gently with warm 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 further 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 further treatment advice.

HOT LINE NUMBER - CHEMTREC (800) 424-9300 (24 hours)

Have the product container or label with you when calling a poison control or doctor or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 69850-1

EPA Est. No. 069850-FRA-001

MANUFACTURED BY
MLPC International
Rion-Des-Landes, France

Net Contents: Fiberboard box - 8.1 kg (17.85 lbs, 270 tubes)
Steel canister - 540 g (1.19 lbs, 18 tubes)
Made in France

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Fatal if inhaled or absorbed through the skin. May be fatal if swallowed. Corrosive. Causes irreversible eye damage and skin burns. When applying in enclosed areas, wear a mask or pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and National Institute for Occupational Safety and Health. Applicators and other handlers must wear: long-sleeved shirt and long pants; socks and chemical resistant footwear; goggles or face shield; chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, vitron). Follow manufacturers' 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. When applying to in-service poles and ties, chemically resistant footwear is not required.

Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly.

STORAGE AND DISPOSAL

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

STORAGE:

- Store only in closed original container to prevent leakage.
- Store only in cool, well-ventilated, locked areas, away from food and feedstuff, out of reach of children and irresponsible persons.
- Avoid exposure to heat and/or direct sunlight.
- Do not drop container onto or slide across sharp objects.

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 HANDLING:

- Nonrefillable container. Do not reuse or refill this container.
- Offer for recycling, if available.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark.

PHYSICAL OR CHEMICAL HAZARDS

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

Batch Code: _____

NOTIFICATION
Date Reviewed:
Reviewed By: *[Signature]*

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