

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 13, 2019

Tasha Lott Regulatory Agent for MLPC International MLPC International c/o Landis International, Inc. P.O. Box 5126 Valdosta, GA 31603

Subject: Notification per PRN 98-10 – Updating the Directions for Use Table and language to include a wider range of treated-pole diameters to the master label. Product Name: Methylisothiocyanate (MITC) EPA Registration Number: 69850-1 Application Date: April 24, 2019 Decision Number: 550523

Dear Ms. Lott,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

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 the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. 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. 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.

If you have any questions, you may contact Lorena Rivas at 703-305-5027 or via email at rivas.lorena@epa.gov.

Page 2 of 2 EPA Reg. No. 69850-1 Decision No. 550523

Sincerely,

1 for

Jacqueline Hardy, Product Manager 34 Regulatory Management Branch II Antimicrobials Division (7510P) Office of Pesticide Programs

Enclose: Stamped notification label

NOTIFICATION

69850-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/13/2019

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. Apply to areas of timbers where decay is suspected or likely to occur

- For remedial treatment of wooden poles/timbers:
- Plug the pre-drilled holes immediately after application; 1
- Do not treat structures/beams indoors; 2.
- 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.

Methylisothiocyanate (MITC) is applied to 7/8" diameter treatment holes drilled into the wood at a 45-degree angle downward. Smaller diameter poles or timbers may require an increased boring angle. For groundline treatment of standing utility poles or timbers, the first hole should be at the groundline with succeeding holes drilled utilizing the pattern and spacing presented in the table below. For an excavated pole or timber, the first hole may start below the groundline with succeeding holes drilled utilizing the pattern and spacing presented in the table below

- Always open tin and tubes in an open area. 2. Have both the opening device and tube with active ingredient within
- arm's reach. Open tin carefully. Place opening device on top of the tube. Remove
- the cap from the tube.
- 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.
- . Repeat application procedure for each hole. 5.

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

Dosage Rate and Drilling Pattern for Standing Utility Poles:

Pole Circumference (Inches)	Number of Tubes Installed and Drilling Pattern
<u>< 16</u>	Methylisothiocyanate (MITC) should not be applied to
	poles less than 16" in circumference due to inadequate
	cross section for required boring depth
16" to 28"	Two holes 8"- 10" deep spaced 120° apart and 12"
	higher than the previously bored hole
29" to 35"	Three holes 14" deep spaced 120° apart and 6" to 8"
	higher than the previously bored hole.
36" to 49"	Four holes 14" deep spaced 90° apart and 6" to 8"
	higher than the previously bored hole
<u>50" to 59</u>	Five holes 14" deep spaced 70° apart and 6" to 8"
	higher than the previously bored hole.
60" to 69"	Six holes 14" deep spaced 60° apart and 4" to 6" higher
	than the previously bored hole.
70" to 79"	Seven holes 14" deep, the first two at groundline 180°
	apart, and the remaining five spaced 60° apart and 4"
	to 6" higher than the previously bored hole.
<u>80" to 90"</u>	Eight holes 14" deep, the first two at groundline 180°
	apart, and the remaining six spaced 50° apart and 4"
	to 6" higher than the previously bored hole.
<u>Greater than 90"</u>	Nine holes 14" deep, the first two at groundline 180°
	apart, and the remaining seven spaced 45° apart and
	4" to 6" higher than the previously bored 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.	PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER: Fatal if inhaled or absorbed through the skin. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed. 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 footwaer; goggles or face shield; chemical-resistant gloves (such as barrier laminate, butly 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.
MLPC Methylisothiocyanate (MITC)	
CAS NO. 556-61-6 FUNGICIDE FOR WOOD	
tive Ingredient: 97.00% ethylisothiocyanate	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
DANGER/PELIGRO	STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal.
FLAMMABLE Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.	PESTICIDE STORAGE: Store only in closed original container to prevent leakage. Store only in cool, well-ventilated, locked areas, away form food

AND DISPOSAL

ood or feed by storage or disposal.

- nal container to prevent leakage. ventilated, locked areas, away form 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 these containers. Fiberboard box: Completely empty fiberboard box. Offer for recycling, if available, or dispose of in a sanitary landfill
- Steel canister: Completely empty steel canister. Offer for recycling, if available, or puncture and dispose of in a sanitary landfill or by other procedures allowed for by state and local authorities

ENVIRONMENTAL HAZARDS

This product is toxic to fish and mammals. For terrestrial uses: 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:

TGI 20190424

Deleted: 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. 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. For a non-excavated pole, the first hole shall be at the groundline and succeeding holes about 6"-8" higher and rotated 90 degrees from the next lower hole. For an excavated pole, the first hole shall be below the ground line utilizing the pattern and spacing presented in the table below.

Deleted: in

Deleted: 35" or less

Deleted: 3 holes beginning at groundline spaced 120 degrees apart and 6"to 8" higher than the previous hole

Deleted: 36" to 49"

Deleted: 4 holes beginning at groundline spaced 90 degrees apart and 6" to 8" higher than the previous hole.

Deleted: 50" to 59"

Deleted: 5 holes beginning at groundline spaced 70 degrees apart and 6" to 8" higher than the previous hole.

Deleted: 60" to 69"

Deleted: 6 holes beginning at groundline spaced 60 degrees apart and 4 to 6" higher than the previous hole

Deleted: 70" to 79"

Deleted: 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.

Deleted: 80" to 90"

Deleted: 8 holes. The first 2 at groundline180 degrees apart and the remaining 6 spaced 50 degrees apart and 4" to 6" higher than the previous hole

Deleted: Over 90"

Deleted: 9 holes. The first 2 at groundline180 degrees apart and the remaining 7 spaced 45 degrees apart and 4" to 6" higher than the previous hole.

KEEP OUT O DANC Si usted no entiende la e expli (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

Active Ingredient:

Methylisothiocyanate

Inert Ingredients.....

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 ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin

immediately with plenty of water for 15-20 minutes. Call a poison control enter or doctor for further treatment advice. F IN EYES: Hold eye open and rinse slowly and gently with warm water for

5-20 minutes_Remove contact lenses, if present, after the first 5 minutes_ nen continue rinsing eve. Call a poison control center or doctor for further reatment advice.

F 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 loctor. Have a person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person

HOTLINE NUMBER - CHEMTREC (800) 424-9300 (24 hours) lave the product container or label with you when calling a poison control or loctor or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the ise 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