



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg. Number:
75101-2

Date of Issuance:
08/30/05

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Tanalith®T Permethrin-Based Lumber Preservative

Name and Address of Registrant (include ZIP Code):

Koppers Arch Wood Protection (NZ) Ltd.
265 James Fletcher Drive
P.O. Box 22-148
Glenfield, Auckland 9, NZ

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Make the following labeling changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read: "EPA Registration No. 75101-2"

Signature of Approving Official:

George LaRocca
George LaRocca
Product Manager (RM 13)
Insecticide Branch
Registration Division (7505C)

Date:

August 30, 2005

- b. Based on the composition of Tanalith T Permethrin-Based Lumber Preservative, some of the label statements recommended below for the product most likely overstate the true acute toxicity effects. However, in view of the absence of Agency required data support and aspiration hazard of mineral spirits, the product is being assigned Toxicity Category I for all acute effects as "worst case". Therefore, revise the Precautionary Statements and add PPE Statements as follows:

Precautionary Statements: Revise to include the following:

Corrosive, Causes Irreversible Eye Damage and Skin Burns, Fatal if Inhaled, May Cause Allergic Skin Reaction, May be Fatal if Swallowed and Absorbed through Skin.

Do not get in eyes, on skin, or on clothing. Do not breathe vapor or mist. Do not take internally. Use only with adequate ventilation. Remove contaminated clothing and wash clothing before reuse. Avoid contamination of food.

Personal Protective Equipment:

Use a full-face protective respirator fitted with an organic vapor cartridge, and wear protective eye wear (goggles, face shield, or safety glasses) while mixing or loading the product, and during any parts of the application process that may result in exposure. Wear gloves and boots that are impervious to the solution (PVC or neoprene) and other protective clothing (long-sleeve shirt, long pants, and coveralls) while mixing or loading the product, and during any parts of the application process that may result in exposure.

Wear gloves that are impervious to the solution (PVC or neoprene) when handling freshly treated wood.

- c. On the front panel, replace the precautions beneath the signal word "Danger" with the word "**Poison**", in red with the skull and crossbones.
- d. First Aid Statements:
Under the "If swallowed", replace "Have person sip a glass of water if able to swallow" with "**Do not give any liquid to the person**".

Under "If on skin or clothing", revise statements to read - "**Take off contaminated clothing; Rinse skin immediately with plenty of water for 15 - 2- minutes; Call a poison control center or doctor for treatment advice**".
- e. Under Directions for Use, add "**Treated wood must not be used or placed where it may contact food or animal feed**".
- f. Add footnote notations (e.g., asterisks or numbers) to the active ingredients "Permethrin" and "Other Ingredients", and add the following corresponding statements directly beneath the ingredient statement:
***Cis/trans ratio: max. 42% (+/-) cis and min. 58% (+/-) trans.**
****Contains Petroleum Distillate .**
- g. On the front panel, delete the word "approved" or add a footnote and asterisk to identify the type and criteria for approval.

3. Submit to the Agency:
 - Data on one year storage stability testing (830.6317), conducted concurrently with the corrosion characteristics study (830-6320) at 0, 3, 6, 9 and 12 months of warehouse storage.
 - A copy of the standards in AS/NZS 2843 (Referenced in Directions for Use).
4. Submit two (2) copies of the revised final printed label bearing the above stated revisions prior to releasing this product for sale.

If you do not comply with the above stated conditions, this registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release of this product for shipment constitutes your acceptance of these conditions.

A copy of the stamped label is enclosed for your records. If you have any questions concerning this action, please contact Dr. B. A. Akinlosotu at (703) 605-0653.

Enclosure:

Tanalith® T

PERMETHRIN-BASED LUMBER PRESERVATIVE

For the treatment of lumber (timber) to provide water repellency and protect against attack by borers and termites in above-ground situations.

For use only in Australia and New Zealand in approved industrial wood treatment facilities.

Active ingredient:	
Permethrin	0.42%
Other ingredients:	99.58%
Total	100.00%

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**
AUG 30 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
75101-2

DANGER
MAY BE FATAL IF SWALLOWED
DO NOT BREATHE VAPORS OR SPRAY MIST
CONTAINS PETROLEUM DISTILLATE

KEEP OUT OF REACH OF CHILDREN

FIRST AID

If swallowed:

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

If on skin:

- Wash affected skin with soap and water.

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.

Poison Information Centre Telephone: New Zealand 03 474-7000; Australia 131 126.

NOTE TO PHYSICIANS: Contains petroleum distillate. Aspiration into the lungs may cause pulmonary edema or chemical pneumonitis. Because of risk of aspiration, gastric lavage should only be undertaken after endotracheal intubation. Treat symptomatically and as for exposure to liquid hydrocarbons.

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

DANGER. May be fatal if ingested and petroleum distillate in product reaches lungs. Harmful if inhaled. Avoid breathing vapor or spray mist. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

Environmental Hazards

This product is extremely toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL:

Store in bulk container in a cool, well-ventilated area. Do not store for prolonged periods in direct sunlight. Keep container closed except when in use.

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.

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

DIRECTIONS FOR USE:

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

This product may be used only to treat timber or lumber made from pine species native to New Zealand or Australia to preserve it against damage by wood boring insects, including drywood (*Cryptotermes*) and subterranean *Coptotermes* and *Schedoerinotermes*) termites, and provide water repellency. Use only to treat timber or lumber to be exported from Australia or New Zealand to the United States of America.

Do not use before obtaining technical advice from Koppers Arch Wood Protection NZ Ltd. (in New Zealand) or Koppers Arch Wood Protection (Aust) Pty. Ltd. (in Australia).

analith® T is a ready-to-use product. Do not dilute before use.

For use only in immersion systems that comply with the Plant Design and Plant Operation requirements of the standards set forth in AS/NZS 2843.

Wood preparation:

This product is intended for use to treat lumber that has been sawed and milled to dimension. Wood must be clean and dry before treatment and must have been kiln dried to permit adequate penetration of preservative during treatment.

Treatment:

Add undiluted Tanalith® T to a vat or other container of a size that is large enough to allow all lumber that is to be treated at one time to be completely covered by the Tanalith® T. Arrange lumber in such a manner that will allow liquid to contact all surfaces of lumber.

Lumber packs should be immersed in undiluted Tanalith® T for 30 to 60 seconds, followed by a 5 to 10 minute drain time.

Alternatively, lumber packs may be placed in an LOSP treatment plant vessel and flooded for 30 to 60 seconds. The solution should then be drained and a final vacuum of -85 kPa applied for 5 to 15 minutes.

Optimum process parameters should be established by trial in order to achieve fluid uptake of between 12 to 20 liters of Tanalith® T per cubic meter of wood and penetration to a depth of at least 5 millimeters from the surface of the wood.

Post-treatment:

After treatment, wood must be held on the drip pad until dripping has stopped, and then conditioned in a ventilated area to remove excess solvent until the wood is completely dry and odor free. Treated wood must not be used or placed where it may contact food or animal feed.

NET CONTENTS:

EPA Reg. No. 75101-E

EPA Est. No.

® Tanalith is a registered trademark of Koppers Arch Wood Protection (NZ) Ltd.

KOPPERS ARCH WOOD PROTECTION (NZ) LIMITED

Address: 265 James Fletcher Drive / PO Box 22-148, Otahuhu, Auckland, New Zealand

Telephone: (09) 276 3646

Emergency Telephone: (09) 276-3646

For information in Australia, contact:

KOPPERS ARCH WOOD PROTECTION (AUST) PTY LIMITED

Address: 15 Blue Street, North Sydney, NSW, 2060.

Telephone: (02) 9954 5433

Emergency Telephone: (02) 4967 4777 (24 hours)