

Ms. Julie Ownby
Arch Wood Protection NZ Limited
265 James Fletcher Drive
PO Box 22-148, Otahuhu
Auckland New Zealand

SEP 24 2008

Dear Ms. Ownby:

Subject: Amendment- name change and update storage and disposal
Tanalith T
EPA Registration Number 75101-02
Your submission dated July 2, 2008

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Under Environmental Hazards delete "This is a non-refillable container. Do not reuse this container. Offer for recycling if available."
2. Update your label in accordance with PR Notice 2007-4.

A copy of the label is enclosed for your records.

If you have any questions you may contact Linda A. DeLuise at 703.305.5428.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

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**:
Total 99.58
100.0%

*Cis/trans ratio: max. 42%(+/-) cis and min. 58% (+/-) trans

** Contains petroleum distillate.

APPROVED
with COMMENTS
to EPA Letter Dated
SEP 24 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
is amended, for the pesticide
registered under EPA Reg. No.
75101-2

Danger



Poison

**MAY BE FATAL IF SWALLOWED
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.
- Do not give any liquid to the person.
- 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 or clothing:

- Wash affected skin with soap and water.
- 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 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.

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

Applicators and other handlers must wear the following while mixing or loading the product, and during any parts of the application process that may result in exposure:

- Use a full-face protective respirator fitted with an organic vapor cartridge
- Long-sleeved shirt and long pants or coveralls, Socks and shoes
- Wear protective eyewear (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
- Chemical-resistant gloves (such as: Barrier Laminate, or any of the following gloves at ≥ 14. mils thickness: butyl nitrile, neoprene rubber, polyvinyl chloride or Viton.

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 extremely toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. This is a non-refillable 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 original container in a cool, dry and well-ventilated area. Keep in tightly closed containers. Store away from incompatible materials. Protect containers from physical damage. Observe all applicable local, state, federal guidelines for storage and disposal.

PESTICIDE DISPOSAL: Pesticide wastes are toxics. 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 DISPOSAL: Plastic Container: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, burn. If burned, stay out of smoke.

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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 *Schedoerino termes*) 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. Treated wood must not be used or placed where it may contact food or animal feed.

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

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

For use only in immersion, spray, or pressure treatment 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 away and a final vacuum of -85 kPa for 5 to 15 minutes.

Optimum process parameters should be established by trial in order to achieve fluid uptake of between 12 and 20 liters of Tanalith® T per cubic meter of wood and penetration to a depth of at least 5 millimeters from the surface of 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 Registration No. 75101-2

EPA Establishment No. 075101-NZL-001

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

ARCH WOOD PROTECTION NZ LIMITED

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Emergency Telephone: (0064) (9) 276 3646

For information in Australia, contact:

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Telephone: (+612) 9954 5433
Emergency Telephone: (+612) 4967 4777 (24 hours)