

75341-2

4/5/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR - 5 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Teri Muchow
Manager-Regulatory Administration
Osmose Utilities Services, Inc.
980 Ellicott Street
Buffalo, NY 14209

Subject: **WOODFUME**
EPA Registration Number: 75341-2
Application Date: January 9, 2012
Receipt Date: January 11, 2012

Dear Ms. Muchow

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide (FIFRA), as amended, is acceptable.

Proposed Amendment

Registrant is clarify label directions for application method and modify active ingredient concentration on the label.

A stamped accepted label is enclosed for your records. Submit a final printed label before selling or distributing the product bearing the revised label.

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Glen McLeod by telephone at (703) 347-0181 or by email at mcleod.glen@epa.gov. When you are submitting information or data in response to this letter, please send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

A handwritten signature in cursive script that reads "Jacqueline Campbell".

Jacqueline Campbell
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510P)



<p>United States Environmental Protection Agency Washington, DC 20460</p>	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 75341-2	2. EPA Product Manager Jacqueline Campbell-McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) WOODFUME	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Osmose Utilities Services, Inc. 980 Ellicott Street Buffalo, NY 14209 <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 checked="" 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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

Amendment of Directions of Use section of the label to clarify the method of application

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	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 Not for retail sale		5. Location of Label Directions <input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input checked="" type="checkbox"/> Other <u>pressure sensitive vinyl</u>	

Section - IV

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

Name Teri Muchow	Title Manager - Regulatory Administration	Telephone No. (Include Area Code) 770-233-4244
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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.

6. Date Application Received
(Stamped)

2. Signature 	3. Title Manager - Regulatory Administration	
4. Typed Name Teri Muchow	5. Date January 9, 2012	



January 10, 2012

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: WOODFUME, EPA Reg. No. 75341-2
Application to Amend Product Label

Dear Sir/Madam:

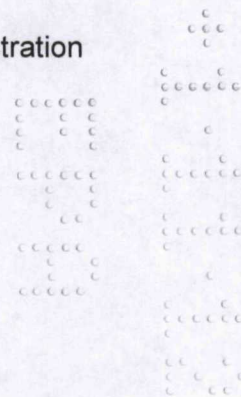
Enclosed is an application to amend the product label for WOODFUME (75341-2), and five copies of the draft label. The "Directions for Use" section of the label is being amended to update and clarify the manner in which the product should be applied. Neither the method of application nor the dose rate has changed.

The enclosed draft label also reflects a change in the percentage of active from 32.7% to 33%. This is a result of on-going reregistration review. A draft label with this change was submitted to Bonnie Alder, per her request, on December 16, 2011. A copy of this correspondence is enclosed.

If you have any questions regarding the enclosed, please contact me. I may be reached by phone at 716-319-3255 or by email at tmuchow@osmose.com.

Sincerely,

Teri Muchow
Manager
Regulatory Administration



Osmose®

WOODFUME®

A Fumigant for Controlling Decay
and Insects in Wood Poles

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if absorbed through the skin. Harmful if swallowed or inhaled. Prolonged or frequent skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear waterproof gloves, safety goggles or face shield, and protective clothing when handling. Wash hands, arms and face thoroughly with soap and water after handling, and before eating, smoking or using the toilet. Remove contaminating clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to mammals, birds, fish, and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment or disposal of waste. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Discharge Elimination system (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. Apply this product only as specified on the label. For guidance, contact your State Water Board or Regional Office of the EPA.

In case of Emergency-Immediately call (24 hours) (800) 424-9300 CHEMTREC.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store away from food or feed in a secure, well ventilated area from extreme temperatures. DO NOT STORE BELOW 0 degrees Fahrenheit. Product crystallizes at lower temperatures. Warm or store at higher temperature and mix to redissolve crystals and assure uniformity before use. Do not store in unmarked containers. Keep container closed when not in use.

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 the 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. Triple rinse as follows: Fill container 1/2 full with water and recap. Shake for 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after flow begins to drip. Repeat procedures two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities.

USE PRECAUTIONS

READ ALL DIRECTIONS BEFORE USING. Apply this product only as specified on this label. Keep children and pets away from treated wood. Do not store near feed or food. Keep container tightly closed when not in use. This product is toxic to fish. Apply only as specified on this label.

Batch Code: _____

FIRST AID

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 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. Call a poison control center or doctor for treatment advice.
If inhaled	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.
If swallowed	Call poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

NOTICE - READ CAREFULLY

CONDITIONS OF SALE: Osmose offers this product for sale subject to, and buyer and all users are deemed to have accepted, the following conditions of sale and warranty which may only be varied by written agreement of a duly authorized representative of Osmose.

WARRANTY LIMITATION: Osmose warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the directions for use on the label subject to the inherent risks referred to below. Osmose makes no other express warranties; THERE IS NO IMPLIED WARRANTY OF MERCHANTABILITY and there are no warranties which extend beyond the description on the label hereof.

INHERENT RISKS: The directions for use on this product are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks associated with use. Buyer assumes all risks associated with use or application of this product contrary to label instructions or resulting from extraordinary weather conditions.

LIMITATION OF LIABILITY: In no case shall Osmose be liable for special, indirect, or consequential damages resulting from the use or handling of this product and no claim of any kind shall be greater in amount than the purchase price of the product in respect of which such damages are claimed.

Osmose and WOODFUME are registered trademarks of Osmose, Inc.

ACTIVE INGREDIENT: Sodium methylthiocarbamate (Anhydrous).....33.0%
INERT INGREDIENT:.....67.0%
TOTAL 100.0%
*Contains 3.18 lbs. active ingredient per gallon

KEEP OUT OF REACH OF CHILDREN

DANGER

READ ENTIRE LABEL FOR PRECAUTIONARY STATEMENTS

PRODUCT INFORMATION

WOODFUME is a fumigant solution. When used as directed, it will arrest internal decay present in poles, piling and similar large timber members. During sterilization of the treated area, a fungitoxic residue is deposited in the cells of the wood. This residue is effective for an indefinite period. Timber known to have internal decay should be scheduled for treatment before they have decayed to the point where replacement is necessary.

DIRECTIONS FOR USE

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

For remedial treatment of wooden poles/timbers:

1. Plug the pre-drilled holes immediately after application;
2. 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, refill the holes further up the pole into relatively solid wood.

WOODFUME may be applied to any section of a pole or timber where internal decay is suspected. Large structural timbers have so many different end uses that the groundline area of a 36" circumference standing pole is taken as a guide and example for application of this product.

For interior decay, drill four 7/8" diameter holes at a 45° angle downward to a depth of 15". The first hole should be at or below the groundline and succeeding holes approximately 6-12" higher and rotated 90° from the next lower hole. Pour 1/4 pint of the fumigant into all holes.

For interior decay in other size poles, drill an adequate number of holes at a 45° angle downward, sufficiently spaced and of sufficient dimensions to allow for the application of the amount of fumigant in accordance with the table below. Pour equal amounts of the fumigant into all holes. Plug holes with treated wood or plastic plugs, using the precaution of wearing safety goggles or a face shield to avoid splashing any of the liquid into the eyes.

Circumference: less than 40"
WOODFUME: 1 pint
Circumference 40" - 50"
WOODFUME: 1.5 pints
Circumference: over 50"
WOODFUME 2 pints

For other types of structural members drill an adequate number of holes, sufficiently spaced and of sufficient dimensions to allow for proper distribution of product. Plug holes with treated wood or plastic plugs, using the precaution of wearing safety goggles or face shield to avoid splashing any of the liquid into the eyes.

EPA Establishment No.: 3008-NY-1

EPA Registration No. 75341-2

DISTRIBUTED BY
OSMOSE UTILITIES SERVICES, INC.
BUFFALO, NY 14209
NET CONTENTS: 1 gallon

