



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 18, 2018

Thomas Woods, Ph.D, Agent
Poles, Inc.
1305 Pecan Street, Unit B
Colorado Springs, CO 80904

Subject: Label Notification per PRN 98-10 –Adding the Registered
Trademark Symbol to the name of the product
Product Name: WP101-PRO®
EPA Registration Number: 88201-1
Application Date: September 17, 2018
Decision Number: 544973

Dear Dr. Woods,

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.

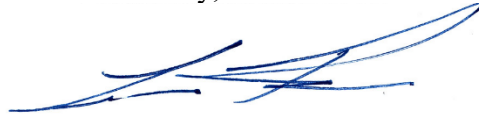
The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

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

Sincerely,

A handwritten signature in blue ink, consisting of several overlapping, fluid strokes that form a cursive-like name.

Registration Risk Manager
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclose: Notification Stamped Label

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

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 ON SKIN, CLOTHES: 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 SWALLOWED: Call 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 do so by the poison control center or doctor. Do not give anything by mouth 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 by mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
GENERAL INFORMATION: Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. For non-emergency and general information on product use, etc., information pertaining to this product, call the National Pesticides Information Center at 1-800-858-7378 (NPIC web site: www.npic.orst.edu). For emergencies, call the poison control center 1-800-222-1222.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear appropriate protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
PERSONAL PROTECTIVE EQUIPMENT (PPE): Applicators and other handlers must wear eye protection such as safety glasses, goggles, or face shield, and chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, vitro). Mixers, loaders, applicators, and other handlers must wear the following: long-sleeve shirt or protective sleeves, long pants, shoes plus socks. Protective clothing must be changed when it shows signs of contamination. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.
USER SAFETY: Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing. Wash the outside of gloves before removing.
ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater rinsate. 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 Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.
NOT FOR HOUSEHOLD USE.

NOTIFICATION

88201-1

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:

10/18/2018

Poles, Inc.

Wood Pole Maintenance Solutions®

WP101-PRO®

A PASTE TO CONTROL DECAY AND INSECT DAMAGE IN WOOD

ACTIVE INGREDIENTS:

Propiconazole..... 0.5%
Tebuconazole..... 0.5%
Disodium Tetraborate Decahydrate..... 45.5%

OTHER INGREDIENTS..... 53.5%

TOTAL..... 100.0%

This product contains 4.63 lbs. of active ingredient per gallon and weighs 9.95 lbs/gal.

DIRECTIONS FOR USE

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

WP101-PRO® is a preservative paste for preventative and remedial treatment of wood, such as posts, poles and timbers. Apply **WP101-PRO®** by brush, trowel, or pump. **WP101-PRO®** stops wood decay in progress, and provides long-term protection against future invasion by wood destroying fungi and insects.

EXTERNAL TREATMENT: After excavation and removal of decayed wood, apply by brush or trowel to a thickness of 1/16 inch to ¼ inch thick to the ground-line and below area of poles, posts, or timbers. Typical application to in-service poles or posts is from 3 inches above ground-line to 18 inches below, or lower if deep decay or damage is detected. How thick the product is applied should take into consideration the location decay hazard, along with the presence or condition of the original preservative treatment. Use the AWP (American Wood Protection Association) decay zone map (AWPA Standard U1-17) for thickness guidance, using a thicker application in more severe decay zones. Paste should be applied evenly to the treatment zone and into seasoning checks or other damaged areas. The treated area should be covered with an approved moisture barrier placed at least 2 inches above the highest treated area and extending belowground to cover the entire treated area. The moisture barrier should be stapled into place. Backfill soil, then tamp, leaving extra soil peaked aboveground to allow for settling. For extra protection, additional moisture barrier may be applied to the aboveground area when livestock or children may be in the area.

Apply to adzed (or other cut/damaged) areas of railroad ties by brush or trowel to a thickness of 1/16 inch to ¼ inch thick.

WP101-PRO® may also be applied in ready-to-use field packaging to wood structures in an area 3 inches above to 24 inches below ground-line. Open the field packaging by removing the inner protective layer along the marked lines. Care should be used not to cut through or tear the outer backing. Apply the exposed preservative side tightly against the wood, then staple into place. Backfill with soil. Do not puncture the outer protective layer of the field packaging. If the outer backing of the field pouch is cut or punctured, repair the damage with a water resistant, durable tape.

INTERNAL TREATMENT: Internal decay, decay pockets, and voids in poles, posts, wooden bridge joints, and other timbers may be treated with **WP101-PRO®** by drilling holes in areas where protection is needed and applying the paste using a pressurized applicator or grease gun. If a less viscous paste is needed, application may be facilitated by adding a small amount of water to **WP101-PRO®**. Plug holes with tight-fitting treated wood or plastic plugs after application.

WARRANTY AND LIMITATIONS OF DAMAGES

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Lack of performance or other unintended consequences may result because of such factors as use of the product contrary to label instructions, abnormal conditions, and the presence of other materials, climatic conditions or the manner of use/application, all of which are beyond the control of the Manufacturer. The buyer/user assumes all such risks.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, MANUFACTURER MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL.

No agent of Manufacturer is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Manufacturer disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Manufacturer's election, the replacement of product.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Avoid exposures to extreme temperatures. Improper disposal is a violation of Federal Law. Store product away from food or feed in a cool dry storage area inaccessible to unauthorized persons and pets. Keep from freezing. Keep container closed when not in use.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste facility. For product packaged in rigid, non-refillable containers with liners, packaging materials may be used as wraps to cover treated areas.

CONTAINER DISPOSAL: For product in one-time use packaging (caulking tubes and one-time plastic pouches), offer container for recycling or dispose of in trash, sanitary landfill, or by incineration. For product packaged in rigid, non-refillable containers with or without liners, do not refill or reuse container. Completely use product, then offer container for recycling, or dispose of in a sanitary landfill or by incineration. Containers greater than 5 gallons in size may be cleaned by triple rinsing, then offered for recycling or reconditioning if available, otherwise puncture and dispose of the containers in a sanitary landfill or by incineration.

Manufactured by:

Poles, Inc.®
1305 Pecan Street, Unit B
Colorado Springs, CO 80904
(719) 685-0333

EPA Est. No. 88201-CO-001

EPA Reg. No. 88201-1

Product Weight 9.95 lbs/gal 1.19 kg/l

HMIS / NPCA Ratings

Health 1 Flammability 0 Reactivity 0

Last Revision: 04/02/18

Net Contents: 42 lbs.

Batch Code: