CENTRAL
ENGINEERING SERVICES

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Tualatin, Oregon 97062
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July 29, 2025

Oregon Department of Environmental Quality
4026 Fairview Industrial Drive Southeast
Salem, Oregon 97320

Attention: Nancy Sawka (Nancy.Sawka@deq.oregon.gov))

Subject: Response to DEQ Comments
Central Project DallasMill-1-01
Dallas Mill Properties
ECSI File #6710
1551 Southeast Lyle Street
Dallas, Oregon

DEAR NANCY SAWKA:

Central Engineering Services (Central) is pleased to provide this response on behalf of Dallas Mill Properties, LLC, to Oregon Department of Environmental Quality (DEQ) comments on previous environmental investigation reports related to the Dallas Mill Properties site in Dallas, Oregon (ECSI File #6710). These reports were prepared in 2009 and 2011 by PES Environmental, Inc. and more recently in 2023 by Farallon Consulting, L.L.C. employees Megan Masterson and Charles Esler, both of whom are now employed by Central.

Attached to this letter is a table presenting DEQ's comments and Central's responses, along with proposed investigation scope items that will address data gaps identified by DEQ during the project document review which includes the data gaps and recommendations from the 2023 investigation. Also attached for your information are figures depicting the site layout and proposed investigation locations, historical aerial photographs, and Safety Data Sheets for products known to have been used on the site.

CLOSING

Central appreciates the opportunity to work with DEQ toward closure of this site. Please contact the undersigned with questions on this submittal.

Respectfully,

Central Engineering Services

Megan Masterson, RG
Senior Engineer

Charles T. Esler
Principal Scientist

Attachments:

- Response to Comments
- Figures
- Historical Aerial Photographs
- Safety Data Sheets

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Response to Comments

DEQ Comment	Response	Proposed Scope of Work
Level I[a] Review		
1. The former log pond located on the west side of the site will need to be investigated for site contaminants of concern in the soil, groundwater, and soil gas (including methane). Also, please provide the location of this former pond on the site figures and if possible, provide the historical photo where it was identified.	The former log pond was identified along the western portion of the Subject Property in historical aerial photographs for the years 1936, 1955, 1970, 1972, and 1982. Copies of historical aerial photographs are included for your review. In addition, the approximate maximum former log pond footprint is provided in Figures 1 and 2. Upon review, PES Phase II boring B-11 appears to be within the footprint of the former log pond. One soil sample, collected between 1.5 and 3 feet below ground surface (bgs), was analyzed for diesel-range and oil-range organics (DRO and ORO, respectively) and polychlorinated biphenyls (PCBs). ORO was detected at a concentration of 1,410 mg/kg. DRO and PCBs were not detected. One reconnaissance groundwater sample was collected from boring B-11 and analyzed for DRO and ORO, polycyclic aromatic hydrocarbons (PAHs), and total suspended solids. DRO and ORO were detected at concentrations of 615 and 1,940 µg/L, respectively. PAH results for groundwater were not provided, although Attachment A of the PES Phase II report states that PAHs were detected at concentrations below generic DEQ Risk-Based Concentrations (RBCs). Considering this one sample does not adequately characterize the entire former log	To characterize the former log pond area, we propose advancing four (4) borings (CESB-01 to CESB-04; Figure 1) within the former log pond footprint for collection and analysis of soil, reconnaissance groundwater, and soil gas sampling. **SOIL** Fill Material: Collect one discrete soil sample from the former log pond fill material. Sampling depth will be determined during drilling based on evidence of impacts and depth to native pond sediment. The fill material soil samples will be analyzed for the following: • DRO and ORO • PAHs • Waste oil metals (cadmium, chromium, lead) Native Pond Sediments: Collect one discrete soil sample from the approximate top 1 foot of the native log pond sediments. The log pond sediment will be analyzed for the following: • DRO and ORO • PAHs • Waste oil metals Samples for dioxins/furans (D/F) and pentachlorophenol (penta) analysis will be collected and submitted to the analytical laboratory on HOLD pending results of the composite soil sample, described below. One composite sample will be collected by adding an equal portion of the log pond sediment from each of the four boring sampling areas to a stainless-steel bowl, where it will be

DEQ Comment	Response	Proposed Scope of Work
	pond area and did not analyze for several chemicals of interest (COIs), we propose additional characterization of the former log pond area *and* fill material used to close the former log pond, as summarized in the next column.	homogenized into one composite soil sample and analyzed for the following: • D/F • Penta **RECONNAISSANCE GROUNDWATER** A reconnaissance groundwater sample will be collected from each boring and will be submitted to the laboratory on HOLD pending the results of the soil samples. Based on the soil results, two reconnaissance groundwater samples will be analyzed for the following: • DRO/ORO • PAHs • Waste oil metals • Penta • D/F **SOIL GAS** Central will collect a methane measurement from each boring using a hand-held meter. A soil gas sample will be collected from the boring with the highest methane measurement from the hand-held meter. The sample will be collected above the groundwater table, at an anticipated depth of 3-5 feet bgs. The soil gas sample will be analyzed for methane.
2. Level I, Page 9, 1st paragraph – was soil in the area at the west end of the infeed decks where transformers were located sampled for PCBs and metals?	We are not aware of previous environmental sampling efforts on the west side of the infeed decks. According to the Level I, the transformers area is paved with asphalt and the report does not indicate any signs of release or reasons to suspect release based on facility personnel interviews. In addition, the facility personnel stated the transformers contained non-PCB oil.	Based on the information provided in the Level I and lack of evidence of a release, no assessment is proposed at this time.

DEQ Comment	Response	Proposed Scope of Work
3. The Level I report identified several areas of anti-sapstain (pentachlorophenol) storage and/or use. Soils and possibly groundwater in these areas should be analyzed for pentachlorophenol and dioxin (a byproduct of penta). Dioxin should be analyzed even if penta is not detected as it reacts differently in the environment and is often detected even in the absence of penta. These areas include: • The store, mixing room, and equipment for treatment solutions on the west end of the planer building (Photos 17 & 19 of Level I), • a spray booth in the planar mill where anti-sapstain was applied, • a spray booth at the lumber exit of the planar where the chemical was applied (east side portion of planar mill), • the outfeed conveyor for lumber located on the north side of the planar building (Photo 16 of Level 1), • green chain exit and area on the east side of the sawmill where anti-sapstain was	Noted. We will retain these areas for further investigation (generalized SOW provided in the next column). We have no records or knowledge of where treated lumber was dried and stored after the anti-sapstain application. We recommend investigating the areas of known anti-sapstain application and storage and can discuss additional sampling areas at a later phase of investigation if the preliminary results suggest it is necessary.	To investigate the five areas of anti-sapstain storage and/or use identified in the Level I report, we propose to advance five (5) borings (CESB-05 through -09) across these areas as follows: • CESB-05 advanced near the store, mixing room, and equipment for treatment solutions on the west end of the planer building; • CESB-06 advanced near the spray booth in the planer mill; • CESB-07 advanced near the spray booth at the lumber exit on the east side of planer building; • CESB-08 advanced near the outfeed conveyor for lumber on north side of the planer building; and • CESB-09 advanced near the green chain exit and application area on the east side of sawmill (also near PES borings B-16 and B-17, and Farallon borings FB-19 and FB-20). For borings CESB-05 through -08, soil will be collected from the first 6 inches of recoverable soil from each boring and will be composited into one sample and analyzed for D/F and Penta. One discrete soil sample will be collected from boring CESB-09, from the top 6 inches of recoverable soil (i.e., soil below the asphalt/concrete and below any construction rock) and will be analyzed for D/F and Penta.

DEQ Comment	Response	Proposed Scope of Work
applied to lumber (sampled for penta, but not dioxin), and • areas where treated lumber was dried and stored after anti-sapstain application.		
4. Level I, Page 13, 1st paragraph – sediment sampling for contaminants of interest should be conducted in exposed areas of Ash Creek, Ash Creek outfalls, upstream area of Ash Creek (background) and any exposed ditches and their outfalls.	Central will perform baseline sampling of Ash Creek, as described in the next column.	For a baseline evaluation of the Ash Creek, we propose collecting the following shallow sediment samples: an upgradient sample west of the Main Street bridge; a downgradient sample, east of Uglow Avenue; and two samples from exposed portions of the creek on the Site. Exact locations are to be determined. Sediment samples will be analyzed for Site COIs and include: • DRO/ORO • PAHs • PCBs • Waste oil metals • D/F • Penta
5. Level I Page 17, 1st paragraph – provide available documentation on the solid waste permit and the fill removal of the hillside waste fill.	No documents associated with the solid waste permit and the fill removal of the hillside were identified. Per our last meeting, the DEQ PM was planning to inquire about the Subject Property to the Solid Waste Program at DEQ. Please let us know if any documents were identified.	None.
6. Level I, general – review historical photos for locations of former hog fuel boilers and potential wigwam burners. These areas need to be	According to the Level I Report, and confirmed with information provided by Dave Williams, President of NorthWest Demolition, who has been familiar with the Subject Property since it	None.

DEQ Comment	Response	Proposed Scope of Work
investigated for contamination released during burning.	was purchased from Weyerhaeuser in 2012, the mill historically used hog fuel, stored on the hillside, to feed two boilers to power the plant. No mention or knowledge of a wigwam burner was identified in the Level I Report or from communications with Dave Williams. In addition, we reviewed previous environmental documents, historical site plans, and historical aerial images from EDR (included as an attachment) and GoogleEarth images. No potential wigwam features were identified in the review.	
7. Level I, Page 23, second to last paragraph and other text on site history identified historical agriculture land and orchards possibly on the site which could be sources of pesticides to the site. Historical pesticides are persistent and can remain as contaminants in the soil for years.	Historical agricultural use was identified on the southern portion of the Subject Property along the hillside in the 1936, 1955, and 1970 historical aerial images provided by EDR (attached). The historical aerial images also show a significant amount of soil disturbance of the previous agricultural land (apparent grading and/or re-use of soil) in the 1970, 1972, 1982, and 1994 historical aerial images. No records or information regarding grading or soil disturbance designs were identified and the final location of historical surface soils is unknown. However, soils in a few small areas do not appear to have been disturbed and/or were only slightly disturbed and include (1) the southeastern portion of the Subject Property,	To evaluate the risk of historical pesticides to the Subject Property from historical agricultural uses, we propose collecting two composite shallow soil samples from the areas where no/low soil disturbance was identified in historical aerial images (CSA-01 and CSA-02; Figure 1). Each composite sample will consist of 10 subsamples collected between 0 and 1 foot bgs. The composited samples will be analyzed for the following: • Organochlorine pesticides; • Organochlorine herbicides; and • Agricultural metals (lead and arsenic).

DEQ Comment	Response	Proposed Scope of Work
	and (2) the vegetated area north of the electrical substation on the southeastern portion of the Subject Property. We propose investigating these areas as they are the most likely to retain contamination from potential historical pesticide application.	
8. Level I, Page 27 and 28, discusses surface water runoff from the anti-sapstain areas and spill areas that flowed into catch basins onsite and then discharged to Ash Creek. These areas need further investigation to determine the location and if sampling is needed.	Our understanding is the only known area of outdoor anti-sapstain application is the green chain exit/east side of the sawmill. Stormwater runoff in this area would flow to one of two catch basins identified on the SPCC Plan for the Subject Property. The stormwater line design and connections are unknown, but it is presumed that stormwater from these catch basins discharges to Ask Creek.	To evaluate potential contamination from stormwater runoff in the area of outdoor anti-sapstain application, we propose collecting a sediment sample from the two the catch basins identified in the vicinity, if accessible. The stormwater sediment will be composited into one sample and analyzed for the following: • D/F • Penta To better understand the stormwater line configuration in this area, we propose tracing the stormwater line from each catch basin to confirm its discharge route.
Phase II, Focused Subsurface Investigation and Site Visit[b]		
1. Metals analysis was not conducted on any of the samples. Metals are often associated with waste oils and should be analyzed in areas where used or waste oils could have been released including oils containing PCBs.	We will augment data for metals in future investigations by adding waste oil metals as a COI in investigation areas where used/waste oil and/or oils containing PCBs may have been present, as reflected in the proposed scopes herein.	Waste oil metals are included as a COI for several proposed areas of investigation described herein, and include the former log pond, infeed deck (where transformers were staged), and in areas of additional investigation from the focused SI report (see response to comment 5 herein).
2. Please provide supporting documentation for the investigation work that was	Documents have been requested from Farallon. None have been provided at this time. We will continue to reach out to Farallon to coordinate	N/A

DEQ Comment	Response	Proposed Scope of Work
completed including soil boring logs and sampling forms.	the project file transfer and will provide those forms via an email attachment once received.	
3. At a minimum, DEQ requires that all sites (except for a few exempt situations) conduct a Tier I Exposure Pathway Assessment for potential ecological risks. Guidance on conducting the assessment can be found on DEQs public website at https://www.oregon.gov/deq/Hazards-and-Cleanup/env-cleanup/Pages/ERA.aspx.	A Tier I Exposure Pathway Assessment will be conducted as part of project closure request documentation.	N/A
4. During the site visit, significant staining was observed in the engine room on the north side of the planar building. This area needs to be cleaned, and subsequent subsurface sampling conducted for contaminants of concern.	The engine room will be evaluated, as described in the next column.	We will evaluate the condition of the building slab by visually assessing cracks, and by cutting the concrete in two locations and evaluating the extent of total petroleum hydrocarbon (TPH) infiltration to the concrete slab. In addition, we will collect one sample of the potentially TPH-impacted material on the ground surface (CES-SS-1) for waste profiling and to inform COIs in the area if additional investigation is warranted. The surface sample will be analyzed for the following: • DRO/ORO • PAHs • Waste oil metals
5. We agree with the conclusions and recommendations of the focused SI report that additional	The 2024 Focused SI Report prepared by Farallon for Dallas Mill Properties, LLC, recommended the following:	The Peeler Lathe Pit, OWS, and Railroad Spur AOPCs will be further investigated as follows.

DEQ Comment	Response	Proposed Scope of Work
investigation is needed to define the extent of contamination in the peeler/lathe pit, oil-water separator and railroad spur areas. Additionally, based on the concentrations of gasoline and diesel in groundwater in the railroad spur area, a soil vapor assessment will likely be needed at some point in the future to evaluation the potential for vapor intrusion into future buildings.	• Additional subsurface investigation to the north, northeast, and west of the Peeler Lathe Pit area of potential concern (AOPC) to determine the extent of contamination. • Additional subsurface investigation north and south of the oil-water separator (OWS) AOPC to determine the extent of contamination in groundwater and a possible source area of contamination. • Additional subsurface investigation north and southeast of the Railroad Spur AOPC to determine the extent and possible source of contamination. These areas will be further evaluated, along with the potential for vapor intrusion in the railroad spur AOPC, in the next phase of investigation, as summarized in the column to the right.	**Peeler Lathe Pit** Advance three borings (CESB-10, CESB-11, and CESB-12) to the north, northeast, and west of the Peeler Lathe Pit AOPC, respectively. One soil sample will be collected from the area of highest observed contamination, based on field screening results, or from the soil-groundwater interface if no obvious signs of contamination were observed. Soil samples will be analyzed for the following: • DRO/ORO • Waste oil metals Collect one reconnaissance groundwater sample from each boring and analyze for the following: • DRO/ORO • Waste oil metals **OWS** Advance two borings to the north and south of the OWS AOPC. The boring to the north of the OWS AOPC will be addressed with already-proposed boring CESB-10 and the boring to the south of the OWS APOC will be addressed with already-proposed boring CESB-01. At least one soil and one grab groundwater sample will be analyzed from each boring for DRO/ORO and waste oil metals, if not already in the analytical plan for the boring. **Railroad Spur** Further investigation into the north of the Railroad Spur AOPC (i.e., off-site) is not feasible without an access agreement with the railroad company, which is unlikely.

DEQ Comment	Response	Proposed Scope of Work
		Advance three borings to the south, west, and center of the Railroad Spur AOPC, borings CESB-13 through -15, respectively. At least one soil sample will be collected from each boring at the area of highest observed contamination or the soil-groundwater interface if no contamination is observed through field screening. If contamination is observed, a second soil sample will be collected below from an area of no observed contamination, if identified, for vertical delineation. Soil samples will be analyzed for the following: • DRO/ORO • Waste oil metals One reconnaissance groundwater sample will be collected from each boring and analyzed for the following: • DRO/ORO • Waste oil metals While backfilling the borings, a temporary soil gas probe will be set a depth of approximately 5 feet bgs. An additional temporary soil gas probe (CESB-16) will be installed near Farallon boring, FB-15, near the northern Subject Property boundary where the highest concentrations of petroleum hydrocarbons were observed in groundwater during previous investigations. Soil gas samples will be collected and analyzed for the following: • GRO and VOCs by EPA Method TO-15 • DRO by EPA Method TO-17

Additional Questions (should be answered prior to addressing data gaps)		
1. Forestry shed was used for mixing pesticides and herbicides. Any idea what kind and what they were used for? Did they spray any areas of the ponds for mosquitos?	The Level I did not observe evidence of release in the vicinity of the Forestry Shed. No records or information regarding the use and/or type of pesticides and herbicides in the Forestry Shed were identified. It is also unknown if historical operations included the spraying of the ponds for mosquitos.	Based on the information provided in the Level I and lack of evidence of a release, no assessment of the Forestry Shed is proposed at this time. To evaluate potential contamination associated with the possible application of pesticides and herbicides in the former log pond, we propose to sample the native pond material collected from borings CESB-01 and CESB-04 for the following: • Organochlorine pesticides • Organochlorine herbicides • Agricultural metals (arsenic and lead)
2. What is the chemical make-up and carrier of the different anti-sapstains/wood treatments that were used including Diacon, Mycostat p20, cherry-tone stain, Kop-coat, NP-1 and Kop-coat Bazooka?	No records or information regarding the chemical make-up and carrier of the aforementioned anti-sapstain/wood treatment materials were provided to Dallas Mill Properties from Weyerhaeuser or were identified at the Subject Property. Safety Data Sheets (SDSs) for the products listed in the Level I Report or similar products were identified through an online search and are attached for your review. The chemicals listed on the provided SDSs were not included as COIs in the DEQ RBCs.	N/A

Notes: [a] PES Environmental, Inc., 2009. *Level I Environmental Site Assessment* and 2011. *Phase 2 Assessment Review and Data Evaluation Report*. Prepared for Weyerhaeuser NR Company. October 2009 and September 26, 2011.
[b] Farallon Consulting, L.L.C. 2023. Letter Regarding Focused Subsurface Investigation, Former Weyerhaeuser Dallas Mill, 1551 Southeast Lyle Street, Dallas, Oregon. To Peter Cairns, Dallas Mills Property LLC. From Megan Masterson and Charles Esler. January 9.

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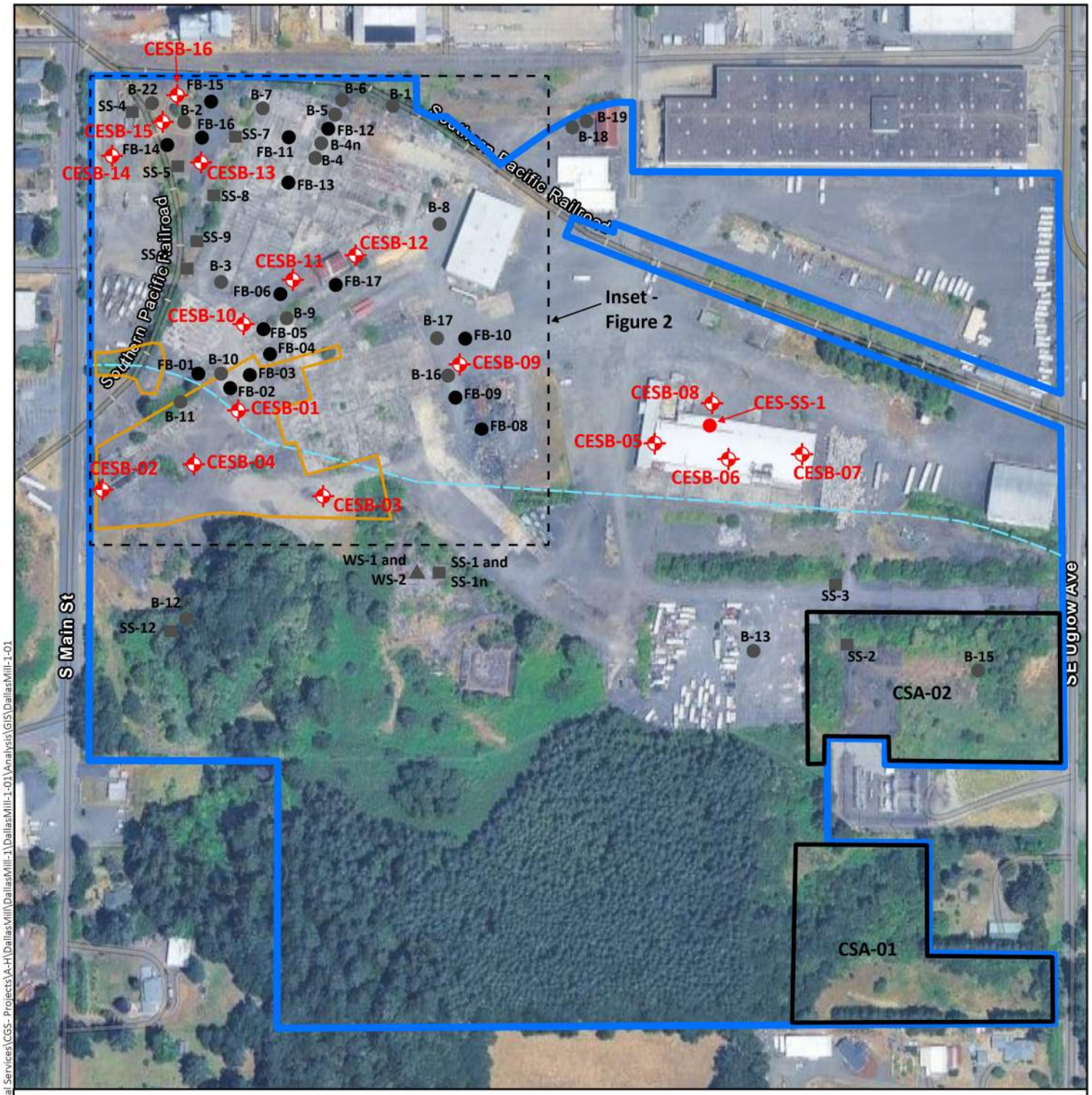
Figures



Legend

- Approximate Site Boundary
- Proposed Surface Sample
- Proposed Boring
- Soil Boring (PES Environmental, INC., 2011)
- Surface Sample (PES Environmental, INC., 2011)
- Wipe Sample (PES Environmental, INC., 2011)
- Soil Boring (Farallon, 2023)
- Ash Creek
- Former Log Pond
- Proposed Composite Soil Areas (CSA)

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0 600 Feet

Sources:© OpenStreetMap (and) contributors, CC-BY-SA, Esri Community Maps Contributors, Oregon Metro, Oregon State Parks, State of Oregon GEO, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, Maxar

DallasMill-1-01

Site Plan

1551 SE Lyle Street, Dallas, OR

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Figure 1

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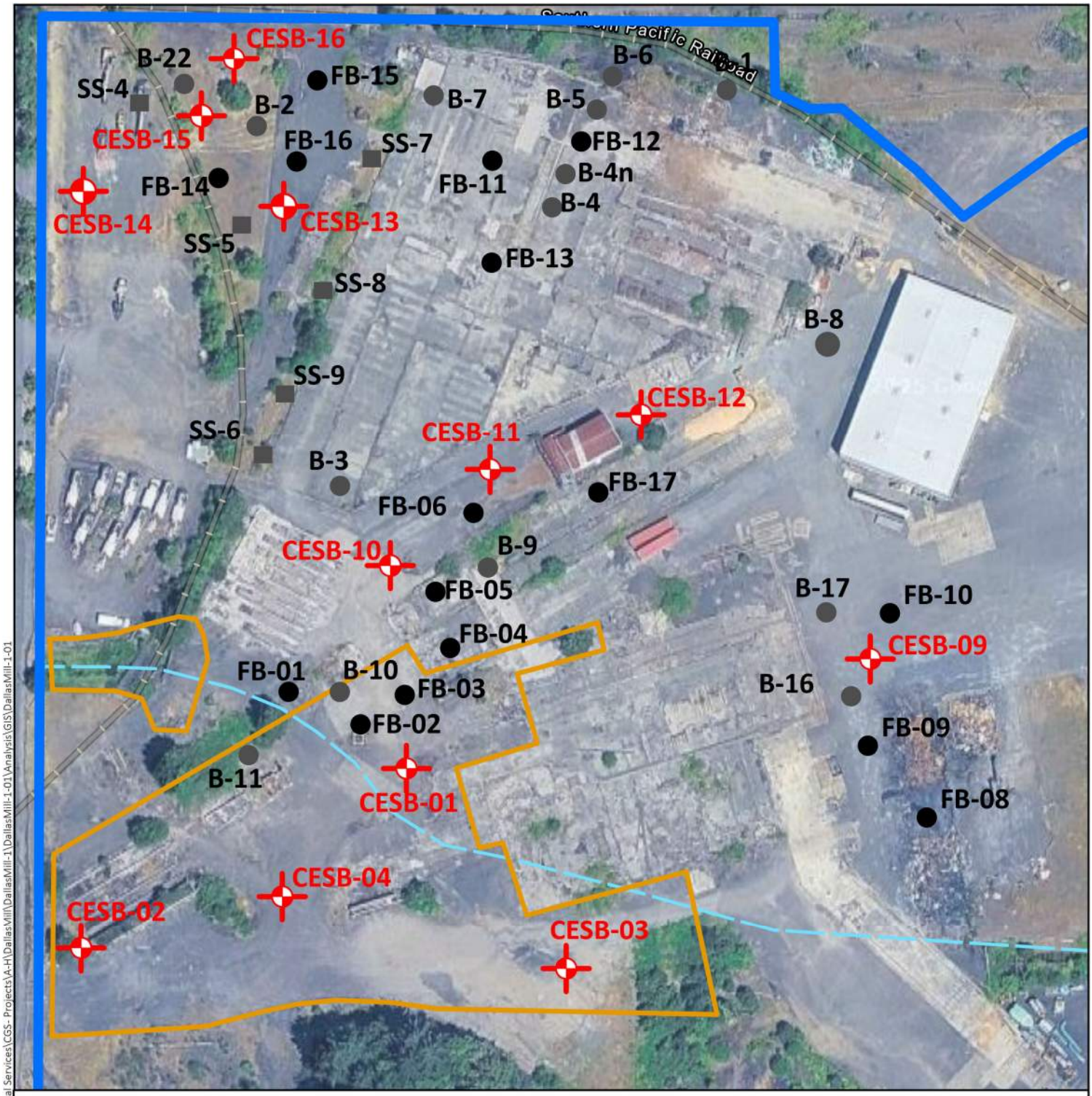

Legend

- Approximate Site Boundary
- Former Log Pond
- Proposed Boring
- Soil Boring (PES Environmental, INC., 2011)
- Surface Sample (PES Environmental, INC., 2011)
- Soil Boring (Farallon, 2023)
- Ash Creek

N

0 400 Feet

Sources:© OpenStreetMap (and) contributors, CC-BY-SA, Maxar, Microsoft, Esri Community Maps Contributors, Oregon Metro, Oregon State Parks, State of Oregon GEO, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS

DallasMill-1-01

Site Plan Inset

1551 SE Lyle Street, Dallas, OR

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Figure 2

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Historical Aerial Photographs

EDR Aerial Photo Decade Package

02/24/20

Site Name:

1551 SE Lyle Street
1551 SE Lyle Street
Dallas, OR 97338
EDR Inquiry # 5982179.8

Client Name:

Green Environmental Management
P.O Box 2212
Sisters, OR 97759
Contact: Sylvia Downing

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

Search Results:

Year	Scale	Details	Source
2016	1"=500'	Flight Year: 2016	USDA/NAIP
2012	1"=500'	Flight Year: 2012	USDA/NAIP
2009	1"=500'	Flight Year: 2009	USDA/NAIP
2006	1"=500'	Flight Year: 2006	USDA/NAIP
1994	1"=500'	Acquisition Date: May 07, 1994	USGS/DOQQ
1982	1"=500'	Flight Date: July 12, 1982	USDA
1972	1"=500'	Flight Date: May 12, 1972	USGS
1970	1"=500'	Flight Date: July 05, 1970	USGS
1955	1"=500'	Flight Date: July 10, 1955	USGS
1936	1"=500'	Flight Date: January 01, 1936	USDA

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AERIAL PHOTOGRAPH - 2016

1551 SE Lyle Street
Dallas, OR 97338

GEM
Green Environmental Management

0 Feet 500 1000 2000

N

AERIAL PHOTOGRAPH - 2012

1551 SE Lyle Street
Dallas, OR 97338

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Green Environmental Management

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AERIAL PHOTOGRAPH - 2009

1551 SE Lyle Street
Dallas, OR 97338

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AERIAL PHOTOGRAPH - 2006

1551 SE Lyle Street
Dallas, OR 97338

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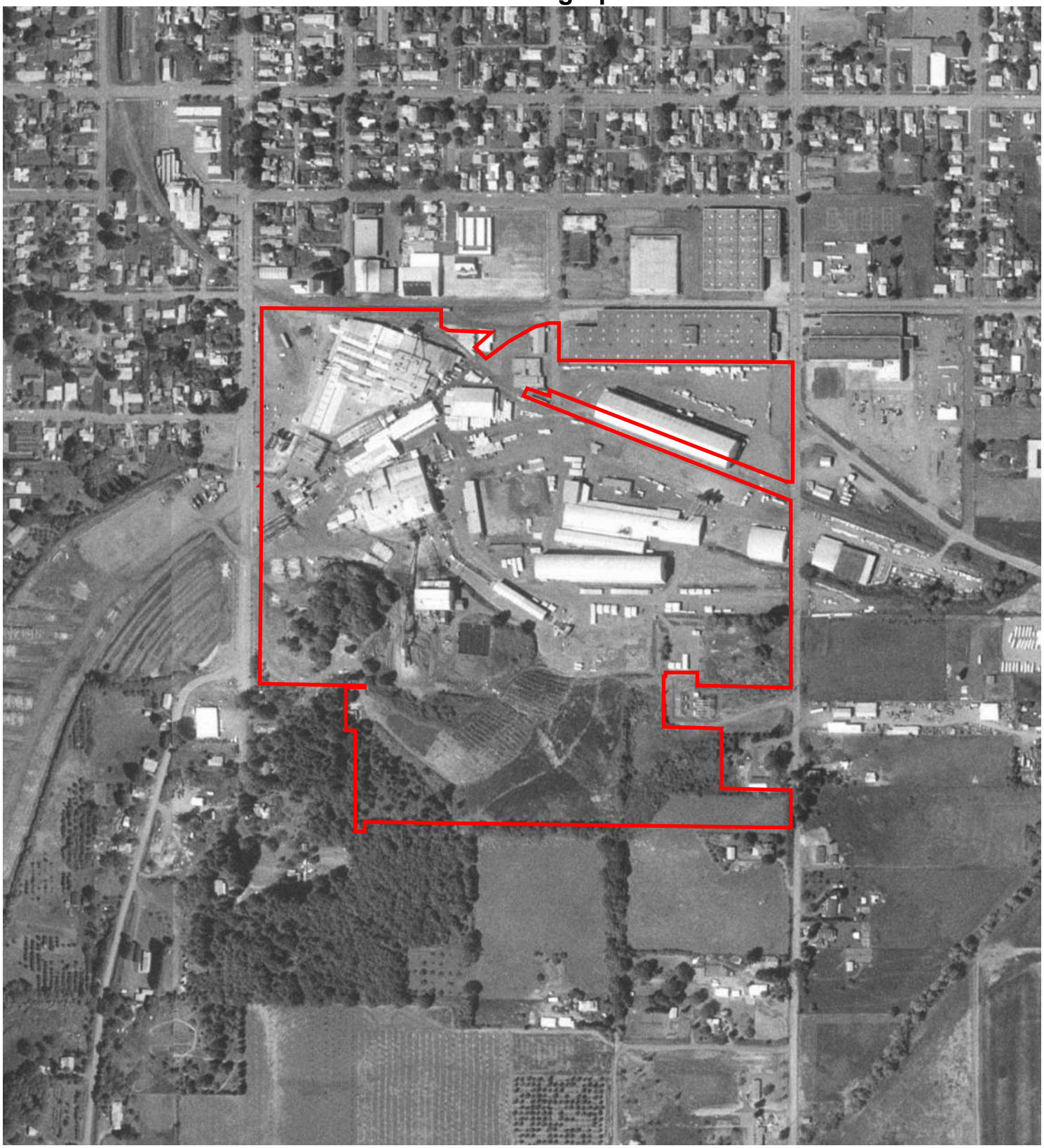

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AERIAL PHOTOGRAPH - 1994

1551 SE Lyle Street
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AERIAL PHOTOGRAPH - 1982

1551 SE Lyle Street
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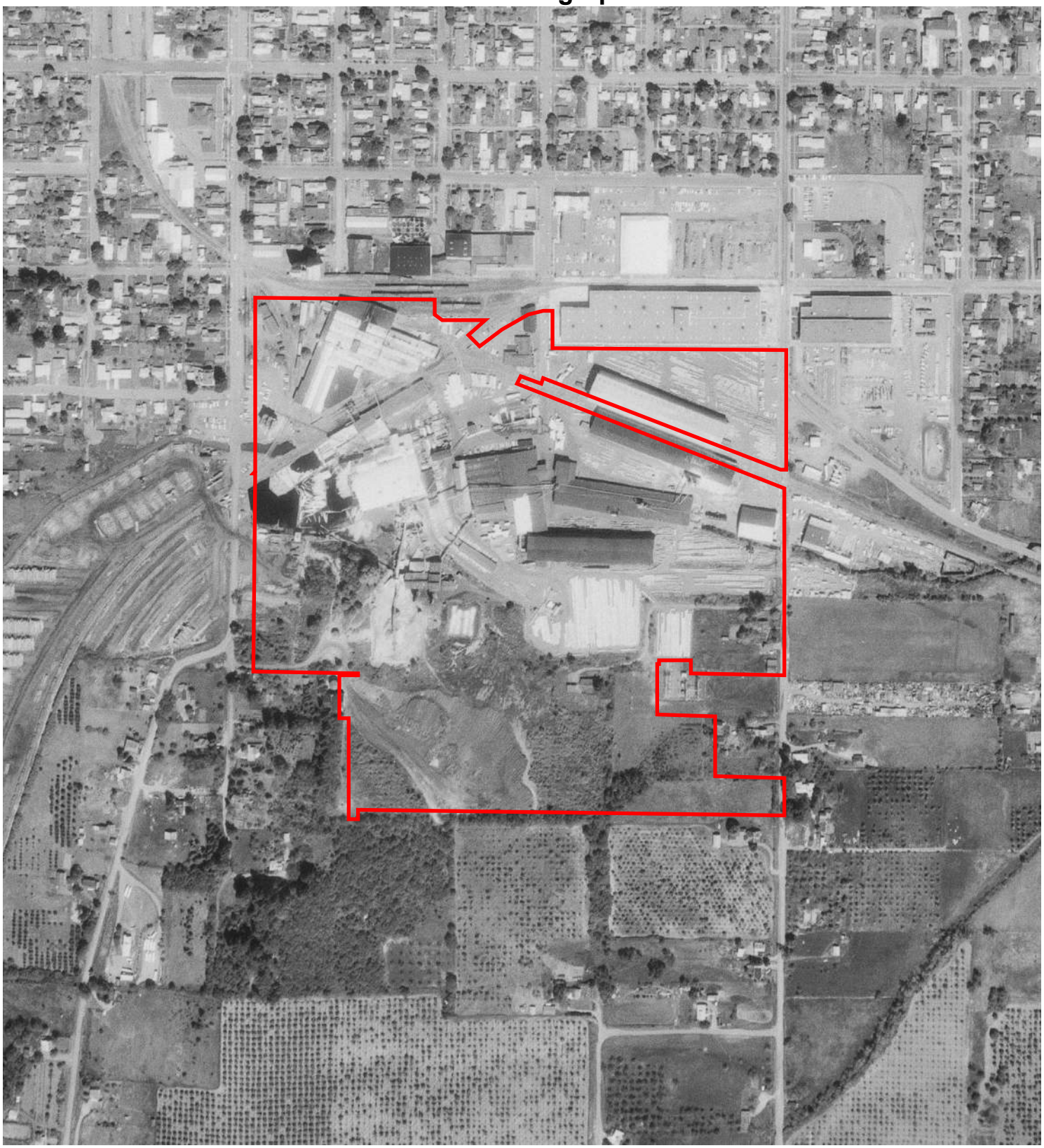

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AERIAL PHOTOGRAPH - 1972

1551 SE Lyle Street
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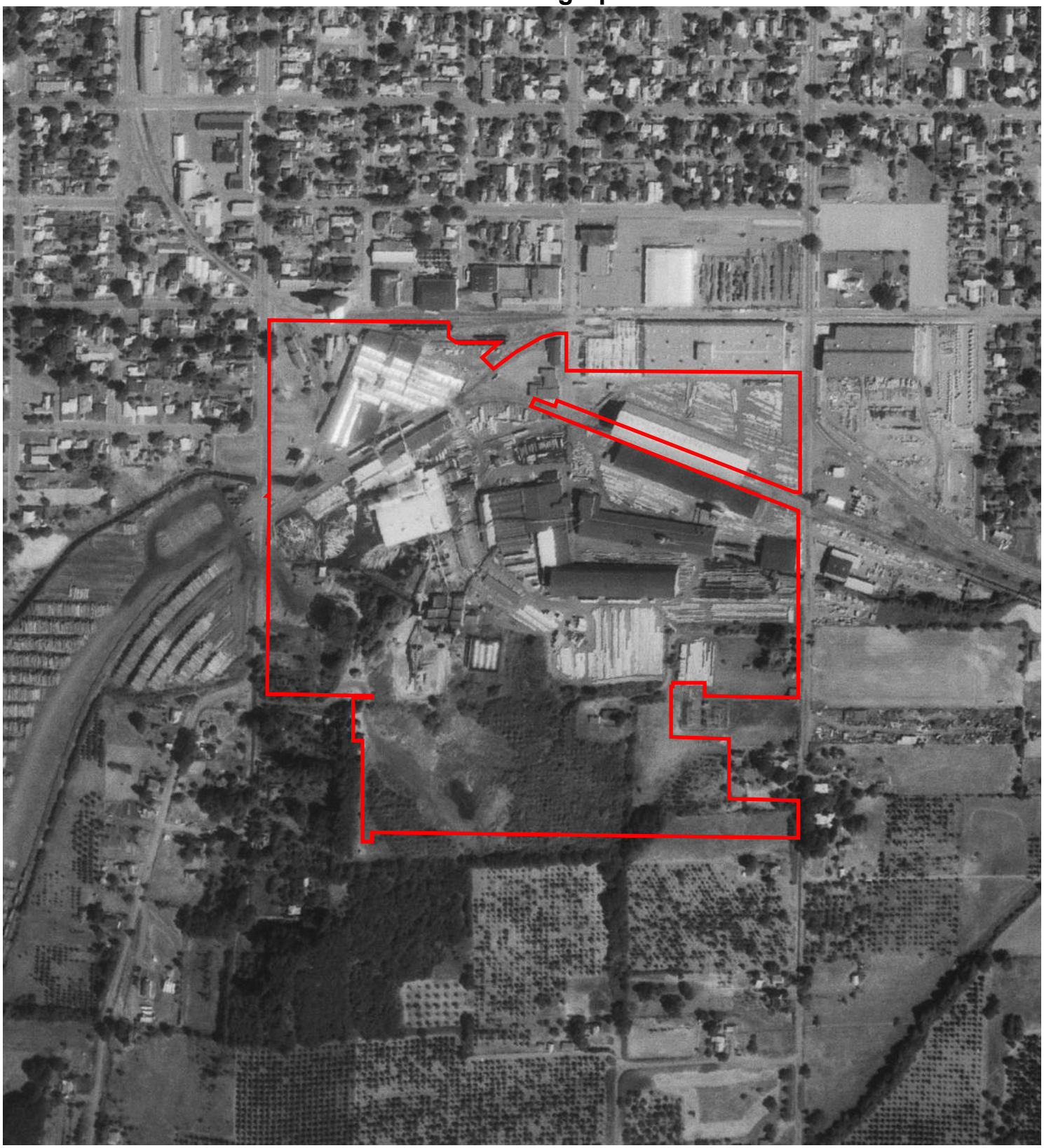

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AERIAL PHOTOGRAPH - 1970

1551 SE Lyle Street
Dallas, OR 97338

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AERIAL PHOTOGRAPH - 1955

1551 SE Lyle Street
Dallas, OR 97338

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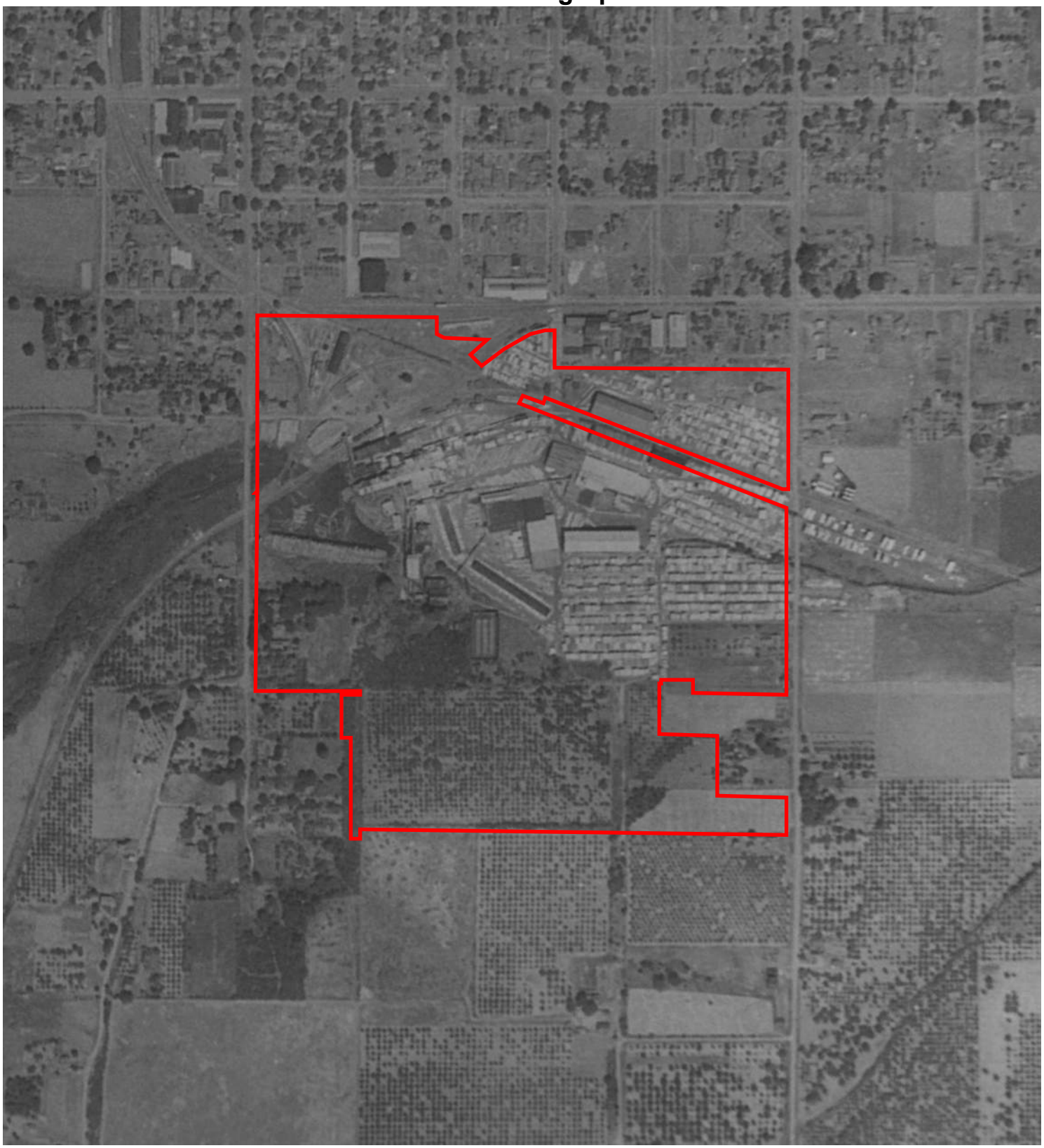

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AERIAL PHOTOGRAPH - 1936

1551 SE Lyle Street
Dallas, OR 97338

GEM Green Environmental Management

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Safety Data Sheets

SECTION 1 - IDENTIFICATION

PRODUCT IDENTIFIER: MYCOSTAT P20 + DIAMULSE C (Customblend 20+80)

PRODUCT USE: Sapstain Control Product

MANUFACTURER:

Diacon Technologies Ltd.
#135-11960 Hammersmith Way
Richmond BC Canada
V7A 5C9

Phone: 1-888-290-2299
(604) 271-8855
Fax: (604) 271-4266

In Case of a Chemical Emergency Call: CHEMTREC (800) 424-9300 (in the U.S.), CANUTEC (613) 996-6666 (in Canada)

SECTION 2 - HAZARD IDENTIFICATION

HAZARD CLASSIFICATION: Skin corrosion (Category 1), Serious eye damage (Category 1), Acute oral toxicity (Category 4), Reproductive toxicity (Category 2), Acute aquatic toxicity (Category 1).

SIGNAL WORD: Danger.

HAZARD STATEMENT: Causes severe skin burns and eye damage. Harmful if swallowed. Suspected of damaging fertility or the unborn child. Very toxic to aquatic life.

HAZARD SYMBOL: Corrosion, Exclamation mark, Health hazard, Environment.

PRECAUTIONARY STATEMENT:

Prevention: Do not breathe dusts or mists. Wash skin thoroughly after handling. Wear protective gloves/protective clothing/eye protection/face protection. Do not eat, drink or smoke when using this product. Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Avoid release to the environment.

Response: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. Wash contaminated clothing before reuse. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Immediately call a POISON CENTER/doctor. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If exposed or concerned: Get medical advice/attention. Collect spillage.

Storage: Store locked up.

Disposal: Dispose of contents/container in accordance with local/state/federal regulations.

SECTION 3 - COMPOSITION / INFORMATION ON INGREDIENTS

HAZARDOUS INGREDIENTS	CAS NUMBER	% (W/W)
Propiconazole	60207-90-1	4
Dipropylene glycol monomethyl ether	34590-94-8	10 – 20
Alkyldimethylamines	68439-70-3	40 – 50
2-Ethylhexanoic acid	149-57-5	10 – 20

SECTION 4 - FIRST AID MEASURES

EYE CONTACT: Hold eyelids open and flush with a steady, gentle stream of water for 15 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. Patient should contact an ophthalmologist if photophobia, pain, blinking, tears or redness persist.

SKIN CONTACT: Remove contaminated clothing immediately. Wash with plenty of soap and water. Get medical attention if irritation develops or burns evident. Launder clothing before re-use.

INGESTION: Do not induce vomiting. Promptly drink 1-2 glasses of water. Avoid alcohol. Never give anything by mouth to an unconscious person. Contact a physician or poison control center immediately. Probable mucosal damage may contraindicate the use of gastric lavage.

INHALATION: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

SECTION 5 - FIRE FIGHTING MEASURES

SUITABLE EXTINGUISHING MEDIA: Use dry chemical, water fog, carbon dioxide, or chemical foam. Do not use direct jet of water.

SPECIFIC HAZARDS ARISING FROM THE CHEMICAL: Combustion products are toxic and may include corrosive vapours, oxides of carbon and nitrogen.

SPECIAL PROTECTIVE ACTIONS FOR FIRE FIGHTERS: Cool fire exposed containers with spray. Use water spray to disperse vapours. Wear full protective equipment and MSHA/NIOSH approved self-contained breathing apparatus. Vapours may be heavier than air and may travel long distances along the ground before igniting and flashing back to the source.

SECTION 6 - ACCIDENTAL RELEASE MEASURES

PERSONAL PROTECTION: Wear rubber gloves, goggles or safety glasses, other personal protective equipment as required to avoid skin contact. Keep people away from spill/leak.

ENVIRONMENTAL PRECAUTIONS: Do not flush to sewer. This product is toxic to fish. Do not contaminate water when disposing of equipment washwaters. 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, federal, state/provincial and local laws. 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.

METHODS AND MATERIALS FOR CONTAINMENT AND CLEANING UP: Always wear appropriate protective equipment prior to handling hazardous materials. Use a NIOSH approved cartridge respirator if the area is not well ventilated and during clean-up, maintenance and repair activities. Remove ignition sources and ground all equipment before beginning clean-up. Dike and contain spill with inert material (sand, earth, etc.); package and label for legal disposal. For a small spill, absorb onto inert medium such as sand or dry earth; Package in an appropriate container and label for legal disposal. If it is a large spill stop leak if without risk. Contain large spills and pump away excess into a dry container. Absorb remainder with dry earth, sand or other non-combustible material. Prevent entry into sewers, basements or confined areas; dike if needed.

SECTION 7 - HANDLING AND STORAGE

PRECAUTIONS FOR SAFE HANDLING: Handle in accordance with good industrial hygiene practice. Prevent contact with eyes, skin, and clothing. Wash thoroughly after handling. Avoid breathing vapour or spray mist.

CONDITIONS FOR SAFE STORAGE: Store in sealed original container in a cool, dry, ventilated area. Do not mix with incompatible materials. Keep from freezing. Do not contaminate water, food, or feed by storage or disposal.

SECTION 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION

EXPOSURE LIMITS:
2-Ethylhexanoic acid:
5 mg/m3 (TLV-TWA)
Dipropylene glycol monomethyl ether:
100 ppm on skin (TLV-TWA), 150 ppm on skin (TLV-STEL)

ENGINEERING CONTROLS: In processes where mists or vapours may be generated, proper ventilation must be provided in accordance with good ventilation practices. General ventilation is normally adequate provided spray mists are contained through negative pressure spraybox design with integrated mist eliminator.

RESPIRATORY PROTECTION: A NIOSH approved cartridge respirator should be worn when in enclosed or poorly ventilated areas.

SKIN PROTECTION: Impervious apron to prevent skin contact. Wear rubber or neoprene gloves.

EYE AND FACE PROTECTION: Chemical goggles, safety glasses or face shield. Do not wear contact lenses.

OTHER: Wear such clothing and footwear as to prevent skin contact. Maintain an eyewash facility and emergency shower.

MYCOSTAT P20 + DIAMULSE C (Customblend 20+80)

SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE: Clear pale yellow liquid	VAPOUR PRESSURE: N/Av
ODOUR: Vinegar-like odour	VAPOUR DENSITY: Heavier than air
ODOUR THRESHOLD: N/Av	DENSITY: 0.882 g/mL @ 20°C (7.360 lbs/USgal)
pH: 6 – 7 (5% solution)	SOLUBILITY: Completely miscible in water
FREEZING POINT: <-10°C (<14°F)	n-OCTANOL/WATER PARTION COEFFICIENT: N/Av
BOILING POINT: >200°C (>392°F)	AUTOIGNITION TEMPERATURE: N/Av
FLASH POINT: >100°C (>212°F)	DECOMPOSITION TEMPERATURE: N/Av
EVAPORATION RATE: <0.5 x n-BuOAc	KINEMATIC VISCOSITY: N/Av
UPPER EXPLOSION LIMIT: 14% (V) for Dipropylene glycol monomethyl ether	DYNAMIC VISCOSITY: N/Av
LOWER EXPLOSION LIMIT: 1.1% (V) for Dipropylene glycol monomethyl ether	VOC (%w/w): 25.1% (1.849 lbs/USgal)

SECTION 10 - STABILITY AND REACTIVITY

REACTIVITY: Under recommended storage and use, hazardous reactions will not occur.

CHEMICAL STABILITY: Stable under recommended storage conditions.

POSSIBILITY OF HAZARDOUS REACTIONS: May react with strong oxidizers and reducing agents.

CONDITIONS TO AVOID: Extreme heat and cold.

INCOMPATIBLE MATERIALS: Avoid contact with strong oxidizers and reducing agents.

HAZARDOUS DECOMPOSITION PRODUCTS: Toxic vapours of amine, oxides of carbon/nitrogen.

SECTION 11 - TOXICOLOGICAL INFORMATION

ROUTE(S) OF EXPOSURE: Skin, Eyes, Inhalation, Ingestion.

ACUTE TOXICITY:
Alkyldimethylamines:
LD50: 1074 mg/kg (oral, rat)
2-Ethylhexanoic acid:
LD50: 3000 mg/kg (oral, rat)
LD50: 1142 mg/kg (dermal, rabbit)
Mycostat P20:
LD50 >660 mg/kg (oral, rat)
LD50 >2000 mg/kg (dermal, rabbit)
LC50 >5.27 mg/L (4 h, rat)

SKIN CORROSION/IRRITATION: Corrosive to skin.

SERIOUS EYE DAMAGE/IRRITATION: Corrosive to eyes.

RESPIRATORY OR SKIN SENSITIZATION: N/Av

GERM CELL MUTAGENICITY:
N/Av

N/Av : Not Available

SECTION 11 - TOXICOLOGICAL INFORMATION (continued)

CARCINOGENICITY: Not listed under IARC, NTP, OSHA.

REPRODUCTIVE TOXICITY:
2-Ethylhexanoic acid: In laboratory animal studies, effects on reproduction have been seen only at doses that produced significant toxicity to the parent animals.
Propiconazole: Did not show teratogenic effects in animal experiments (rat, 30 mg/kg).
Dipropylene glycol monomethyl ether: Did not show developmental toxicity effects in animal experiments (rat, NOAEL: 300ppm, F1: 1000 ppm, F2: 1000 ppm)

TERATOGENICITY: N/Av

STOT-SINGLE EXPOSURE: N/Av

STOT-REPEATED EXPOSURE: N/Av

ASPIRATION HAZARD: N/Av

SECTION 12 - ECOLOGICAL INFORMATION

ECOTOXICITY: This product is toxic to fish and shrimp.
Alkyldimethylamines:
LC50 (zebra fish, 96 hr) < 1 mg/L
2-Ethylhexanoic acid:
LC50 (fathead minnow, 96 hr): 70 mg/L
Propiconazole:
LC50 (rainbow trout, 96 h): 4.3 mg/L
Dipropylene glycol monomethyl ether:
LC50 (guppy, 96 h) >1000 mg/L

PERSISTANCE AND DEGRADABILITY:
Propiconazole:
Not readily biodegradable.

BIOACCUMULATIVE POTENTIAL:
Propiconazole:
Bioconcentration factor (BCF): 146

MOBILITY IN SOIL:
Propiconazole:
Moderately mobile in soils.

SECTION 13 - DISPOSAL CONSIDERATIONS

Dispose in accordance with local, state/provincial, and federal regulations.

SECTION 14 - TRANSPORT INFORMATION

CANADIAN TRANSPORTATION OF DANGEROUS GOODS REGULATIONS:
UN 2735, AMINES, LIQUID, CORROSIVE, n.o.s. (alkyldimethylamines), Class 8, Packing Group II

US DOT HAZARDOUS MATERIALS REGULATIONS:
UN 2735, AMINES, LIQUID, CORROSIVE, n.o.s. (alkyldimethylamines), Class 8, Packing Group II

MYCOSTAT P20 + DIAMULSE C (Customblend 20+80)

SECTION 15 - REGULATORY INFORMATION

CANADIAN FEDERAL REGULATIONS:
WHMIS: Class E, D2A
This product has been classified under WHMIS 1998.

UNITED STATES FEDERAL REGULATIONS:
HMIS: Health 3, Flammability 1, Reactivity 0, Personal Protective Equipment X
This product has been classified under 29CFR and the SDS contains information elements required under 29CFR.

SARA SECTION 302 (40CFR355.30), SARA SECTION 304 (40CFR355.40):
This product does not contain any chemicals that require emergency planning based on Threshold Planning Quantities (TPQ) or release reporting based on Reportable Quantities (RQ).

SARA HAZARD CATEGORIES, SARA SECTIONS 311/312 (40CFR370.21):
Acute Health Hazard, Chronic Health Hazard

SARA SECTION 313 (40CFR372.65):
This product contains the following toxic chemicals subject to the reporting requirements of the Emergency Planning Community Right-to-Know Act of 1986. This information must be included in all SDS's that are copied and distributed for this material.
Propiconazole CAS #: 60207-90-1 %w/w: 4%

OSHA HAZARD COMMUNICATION STANDARD:
This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29CFR 1910.1200.

CALIFORNIA PROPOSITION 65:
This product does not contain any chemicals known to the State of California to cause cancer, birth defects or other reproductive harm.

SECTION 16 – OTHER INFORMATION

PREPARATION DATE: June 8, 2015

PREPARED BY: DIACON Technologies Ltd. - Regulatory Affairs Office

REVISIONS: 150608

NOTICE: Every effort is made to ensure that the data presented herein are current and factual; however, no warranty or any other legal responsibility is to be construed from this document. Numerical data represent nominal and/or typical properties and do not constitute specifications. Any use of the information presented herein must be determined by the user to be in accordance with applicable Federal, State/Provincial and local laws and regulations.

N/Av : Not Available

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 22, 2018

Ronald W. Clawson, Jr. Ph.D.
Research and Development Manager
Kop-Coat, Inc.
3040 William Pitt Way
Pittsburgh, PA 15238

Subject: Amended Reregistration Label
Product Name: NP-1 Sapstain Control Chemical
EPA Registration Number: 92617-3
Decision Number: 537994

Dear Mr. Clawson:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the DDAC RED and Carbamic acid, butyl-, 3-iodo-2-propynyl ester RED, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

NOTE: This product is **not** yet being reregistered under section 4(g) of FIFRA.

Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated 02/26/1998
- Alternate CSF 1, dated 01/20/1997

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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment or the next printing of the label, whichever occurs first, must bear the

new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, you may contact Joe Daniels at (703) 347-8669 or via email at daniels.joseph@epa.gov.

Sincerely,

Eric Miederhoff
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

KOP-COAT

NP-1® Sapstain Control Chemical

U.S. Patent No. 4,950,685 and Foreign Patents

Aids in the control of blue stain, mold and decay of freshly cut lumber when properly used. Effective on softwoods including Douglas fir, White fir, Spruce, Hemlock, the Pines including both the Southern and Western Yellow Pines, Eastern and Western White Pines and many of the hardwoods.

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No. 92617-3
EPA Est. No. 60061-MO-1

Read Disclaimer on side panel before buying or using. If such terms are not acceptable, return at once unopened.

ACTIVE INGREDIENTS	
Didecyl dimethyl ammonium chloride	64.80%
3-Iodo-2-Propynyl Butyl Carbamate	7.60%
OTHER INGREDIENTS	27.60%
TOTAL	100.00%

ACCEPTED
03/22/2018
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 92617-3

FIRST AID	
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • · Call poison control center or doctor for treatment advice.
IF ON SKIN OR ON CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • ·Call poison control center or doctor for treatment advice.
IF SWALLOWED	• Call poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by a poison control center or doctor. • · Do not give anything by mouth to an unconscious person.
IF INHLAED	• 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.
HOT LINE NUMBERS	• Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 800-548-0489 for emergency

	medical treatment information. • ·Transportation emergency contact 800-424-9300.
NOTE TO PHYSICIAN	• Probable mucosal damage may contraindicate the use of gastric lavage. Corrosive to eyes and skin.

Kop-Coat, Inc.
Protection Products Division
5137 Southwest Avenue, St. Louis MO 63110
314-772-2200

Net Contents Gallons

DIRECTIONS FOR USE

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

GENERAL PRECAUTIONS AND RESTRICTIONS

FOR INDUSTRIAL USE

CONSULT SAFETY DATA SHEET BEFORE USING

Do not apply this product in a way that will contact workers or other persons.

Wear synthetic rubber gloves or plastic coated gloves in handling solutions and freshly treated lumber.

DILUTE BEFORE USING

Volumetric Dilution and Retention* on Green Wood Species

Parts NP-1®	Parts H_2O	Retention		Parts NP-1®	Parts H_2O	Retention
1	15	0.0625%		1	160	0.0062%
1	40	0.0244%		1	185	0.0054%
1	60	0.0164%		1	205	0.0049%
1	80	0.0123%		1	225	0.0044%
1	100	0.0099%		1	245	0.0041%
1	120	0.0083%		1	265	0.0038%
1	140	0.0071%		1	285	0.0035%
1	145	0.0068%		1	290	0.0034%
1	150	0.0066%		1	295	0.0034%
1	155	0.0064%		1	300	0.0033%

*-Retention Based on Minimum Gravimetric Uptake on Nominal Wood Density of 30 lb/ft^3

GENERAL INFORMATION

For the best results lumber should be treated immediately after it is sawn. A delay in treatment of 24 hours or more permits stain, mold and decay growth to start which requires a heavier treatment to achieve control of surface growth. Delayed application and log borne infection result in internal stain often under a bright

surface. Lumber and logs should be totally immersed or sprayed so as to ensure all surfaces are treated.

Freshly dipped or sprayed lumber should be protected from rain washing. Dip tanks and drip aprons must be roofed, paved and drained to prevent dilution and loss of the anti-stain solution. Antistain treatment concentrations must be geared to achieve protection of the thickest or most valuable item being treated. The concentration of the ready-to-use anti-stain solution must be adjusted to accommodate seasonal changes in the exposure and species being treated. Dip tanks and spray equipment must be properly maintained.

Treated sawdust and other wood wastes should be disposed of properly and should not be used as mulch where it will come into contact with useful living plants. Care should be taken to prevent drip or spray from contacting ornamental shrubs, trees, grass and other desirable vegetation.

MIXING INSTRUCTIONS

For high pressure spray applications: Thoroughly mix one gallon of NP-1® Sapstain Control Chemical per 15 to 50 gallons of water.

For dip applications: Thoroughly mix one gallon of NP-1® Sapstain Control Chemical per 40 to 300 gallons of water. In all cases, dilution levels will depend upon application methods, lumber species and conditions of lumber storage. Mills should conduct tests to determine treatment requirements for their individual needs. Contact Kop-Coat for further information. When using proportioning pumps for mixing, this product should be maintained at temperatures above 50°F to prevent inaccurate mixing due to viscosity changes. Minor proportioning rate changes can be affected by changing the setting on the pump dial.

NOTE: With normal dip or spray application long term control of decay cannot be achieved. This product is intended to provide decay, mold and blue stain control during storage. Such control would not likely extend to the use site.

Wood treated with didecyl dimethyl ammonium chloride shall not be used in the construction of bee hives.

STORAGE AND DISPOSAL

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

Storage: Store in a closed, properly labeled container in a cool place. If static generating conditions exist, provide necessary grounding and bonding. Keep containers 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 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 container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application

equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER.

Corrosive. Causes irreversible eye damage. Causes skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Wear goggles and if splashing is possible, face shield. Wear barrier laminate, nitrile rubber or Viton gloves. Do not breathe vapor or spray mist. Wear respiratory protection as specified below. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers and loaders using liquid formulation must wear:

1. Coveralls worn over long-sleeved shirt, long pants
2. Chemical resistant footwear plus socks
3. When mixing or loading, wear a chemical-resistant apron
4. Wear goggles and if splashing is possible, face shield
5. Barrier laminate, nitrile rubber or Viton gloves
6. A NOISH approved respirator with an organic vapor (OV) cartridge with a combination N, R or P filter with NIOSH approval number prefix TC-84A; or a NIOSH approved gas mask with a canister with NIOSH approval number prefix TC-14G; or powered air purifying respirator with organic vapor (OV) cartridge and combination HE filter with NIOSH approval number prefix TC-23C.

USER SAFETY REQUIREMENTS

- Follow manufactures instructions for clean/maintaining PPE. If no such instructions exist for washables, 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 this products concentrate. Do not reuse them.

USER SAFETY RECOMMEDATIONS

Users should:

- 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. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

NOTICE

This product contains a chemical known to the State of California to cause cancer and/or to cause birth defects or other reproductive harm.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing equipment wastewaters. 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 Eliminations 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 Environmental Protection Agency.

Treated lumber must be stored under cover, or indoors, or at least 100 feet from any pond, lake, stream, wetland, or river to prevent possible runoff of the product into the water way. Treated lumber stored outdoors within 100 feet of a pond, lake, stream or river must be either covered with plastic or surrounded by berm to prevent surface water runoff into the nearby waterway. If a berm is used around the site, it must consist of impermeable material (clay, asphalt, concrete) and be sufficient height to prevent runoff during heavy rainfall events.

PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE - Do not use, pour, spill, or store near heat or open flame.

IN CASE OF FIRE

Use alcohol foam, dry chemical, carbon dioxide, water spray, fog or foam to extinguish fire.

DISCLAIMER

To the extent consistent with applicable law, seller (whether manufacturer, distributor, or other) makes no warranty express or implied, including the implied warranty of merchantability AND IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE regarding this product except the composition as set forth in the ingredient statement herein, and shall not be liable for LOST PROFITS, LOST PRODUCTION, LABOR COSTS, TRANSPORTATION CHARGES, OR ANY special, consequential, INCIDENTAL OR DELAY

damages, the exclusive remedy being the replacement of the product. To the extent consistent with applicable law, buyer or user assumes all risk of possession, handling or use of this material when such use and/or handling is contrary to label instructions.

12460v1/1B/R01/021216v2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 15, 2018

Angie Custer
Regulatory Affairs Specialist
Kop-Coat, Inc.
3040 William Pitt Way
Pittsburgh, PA 15238

Subject: Label Notification per PRN 98-10 –Updating the Warranty & Disclaimer language. Plus; minor formating changes on the master label.
Product Name: Bazooka® Sapstain and Mold Control Product
EPA Registration Number: 92617-12
Application Date: January 23, 2018
Decision Number: 538098

Dear Ms. Custer,

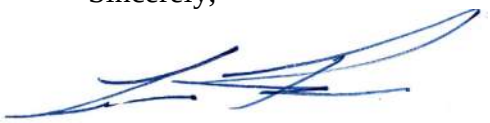
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls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

Sincerely,



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

Enclose: Notification Stamped Label

DIRECTIONS FOR USE

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

GENERAL PRECAUTIONS AND RESTRICTIONS:

FOR INDUSTRIAL USE

CONSULT SAFETY DATA SHEET (SDS) BEFORE USING

DILUTE BEFORE USING

Do not apply this product in a way that will contact workers or other persons, either directly or through spray drift. Only protected handlers may be in the area during application.

Wear synthetic rubber gloves or plastic coated gloves in handling solutions and freshly treated lumber.

Treated sawdust and other wood wastes should be disposed of properly and should not be used as mulch where it will come into contact with useful living plants. Care should be taken to prevent drip or spray from contacting ornamental shrubs, trees, grass, and other desirable vegetation.

GENERAL INFORMATION

Freshly dipped or sprayed lumber should be protected from rain-washing. Dip tanks and drip aprons must be roofed, paved, and drained to prevent dilution and loss of the anti-stain solution. Treatment concentrations must be geared to achieve protection of the thickest or most valuable item being treated. The concentration of the ready-to-use solution must be adjusted to accommodate seasonal changes in the exposure, species being treated, dip tanks, and spray equipment must be properly maintained.

MIXING INSTRUCTIONS

For high-pressure spray applications: Thoroughly mix one gallon of Bazooka® Sapstain and Mold Control Product per 2 to 500 gallons of water.

For dip applications: Thoroughly mix one gallon of Bazooka® Sapstain and Mold Control Product per 20 to 1,000 gallons of water. In all cases, dilution levels will depend upon application methods, lumber species, and conditions of lumber storage. Mills should conduct tests to determine treatment requirements for their individual needs. Contact Kop-Coat for further information. When using proportioning pumps for mixing, this product should be maintained at temperatures above 50°F to prevent inaccurate mixing due to viscosity changes. Minor proportioning rate changes can be affected by changing the setting on the pump dial.

Maximum application rate is 0.8% w/w Diiodomethyl-para-Tolyl sulfone for sapstain wood preservation.
Maximum application rate is 0.7 lb Diiodomethyl-para-Tolyl sulfone for pressure treated wood application.

NOTE: With normal dip or spray application long-term control of decay cannot be achieved. This product is intended to provide decay, mold, and blue stain control during storage. Such control would not likely extend to the use site.

STORAGE AND DISPOSAL

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

Storage: Store in a closed, properly labeled container in a cool place. If static generating conditions exist, provide necessary grounding and bonding. Keep containers 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 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 container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinse into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available.

KOP-COAT

Bazooka®
Sapstain and Mold Control Product

U.S. Patent Number 6,375,727and 7,056,919. Additional Patents Pending

Aids in the control of blue stain, mold and decay of freshly cut lumber, dry lumber and other wood based products when properly used. Effective on softwoods including Douglas fir, White fir, Spruce, Hemlock, the Pines including both the Southern and Western Yellow Pines, Eastern and Western White Pines and many of the hardwoods.

NOTIFICATION
92617-12
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:
02/15/2018

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No. 92617-12
EPA Est. No. 60061-MO-1

Read Disclaimer on side panel before buying or using. If such terms are not acceptable, return at once unopened.

ACTIVE INGREDIENTS	
Diiodomethyl-para-Tolyl sulfone	0.95%
(Propiconazole) 1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]-methyl-1H-1,2,4-triazole	3.50%
(IPBC) 3-Iodo-2-Propynyl Butyl Carbamate	3.50%
OTHER INGREDIENTS	92.05%
TOTAL	100.00%

FIRST AID	
IF ON SKIN OR ON CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call poison control center or doctor for treatment advice.
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call 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 mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	• Call a 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
HOT LINE NUMBERS	• Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 800-548-0489 for emergency medical treatment information. • Transportation emergency contact 800-424-9300.
NOTE TO PHYSICIAN	• Probable mucosal damage may contraindicate the use of gastric lavage. • Corrosive to eyes and skin. Continue to flush eyes and skin with water until treatment advice is provided by poison control center or doctor.

Kop-Coat, Inc.
Protection Products Division
5137 Southwest Avenue, St. Louis MO 63110
314-772-2200

Net Contents Gallons

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Corrosive. Causes skin burns. Causes irreversible eye damage. Harmful if swallowed, absorbed through skin, or inhaled. Do not get in eyes, on skin, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

1. Coveralls over long-sleeved shirt and long pants
2. Chemical-resistant footwear plus socks
3. Goggles or face shield
4. Chemical-resistant gloves (such as barrier laminate, nitrile rubber, neoprene rubber and viton)

USER SAFETY RECOMMENDATIONS

User must:

- Follow manufactures instructions for clean/maintaining PPE. If no such instructions 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 this product's concentrate. Do not reuse them.

USER SAFETY INSTRUCTIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product. Wash outside of gloves before removing. As soon as possible wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing equipment wastewaters. 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 Environmental Protection Agency.

Until product has dried, antisapstain treated lumber must be stored under cover, indoors, or at least 100 feet from any pond, lake, stream, wetland, or river to prevent possible runoff of the product into the waterway. Treated lumber stored within 100 feet of a pond, lake stream, or river must be either covered with plastic or surrounded by a berm to prevent surface water runoff into the nearby waterway. If a berm or curb is used around the site, it should consist of impermeable material (clay, asphalt, concrete) and be of sufficient height to prevent runoff during heavy rainfall events.

PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE - Do not use, pour, spill, or store near heat or open flame.

IN CASE OF FIRE

Use water, fog, foam, carbon dioxide or dry chemical. Cool closed container with water.

DISCLAIMER

To the extent consistent with applicable law, seller (whether manufacturer, distributor, or other) makes no warranty express or implied, including the implied warranty of merchantability AND IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE regarding this product except the composition as set forth in the ingredient statement herein, and shall not be liable for LOST PROFITS, LOST PRODUCTION, LABOR COSTS, TRANSPORTATION CHARGES, OR ANY special, consequential, INCIDENTAL OR DELAY damages, the exclusive remedy being the replacement of the product. To the extent consistent with applicable law, buyer or user assumes all risk of possession, handling or use of this material when such use and/or handling is contrary to label instructions.

18090/48A/R04/061617

SAFETY DATA SHEET

Antique Cherry Wood Stain

Section 1. Identification

GHS product identifier : Antique Cherry Wood Stain

Other means of identification : Not available.

Product type : Liquid.

Relevant identified uses of the substance or mixture and uses advised against

Identified uses : Water-based wood stain.

Manufacturer :
General Finishes
2462 Corporate Circle
East Troy, WI 53120
U.S.A.
Phone no.: 262-642-4545
Toll free no.: 1-800-783-6050
Fax no.: 262-642-4707
Web: GeneralFinishes.com

Emergency telephone number (with hours of operation) : CHEMTREC, U.S. : 1-800-424-9300 International: +1-703-527-3887 (24/7)

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Classification of the substance or mixture : SKIN SENSITIZATION - Category 1

GHS label elements

Hazard pictograms :

Signal word : Warning

Hazard statements : H317 - May cause an allergic skin reaction.

Precautionary statements

Prevention : P280 - Wear protective gloves.
P261 - Avoid breathing vapor.
P272 (OSHA) - Contaminated work clothing must not be allowed out of the workplace.

Response : P302 + P352 + P363 - IF ON SKIN: Wash with plenty of soap and water. Wash contaminated clothing before reuse.
P333 + P313 - If skin irritation or rash occurs: Get medical attention.

Storage : Not applicable.

Disposal : P501 - Dispose of contents and container in accordance with all local, regional, national and international regulations.

Section 2. Hazards identification

Hazards not otherwise classified : None known.

Section 3. Composition/information on ingredients

Substance/mixture : Mixture

Other means of identification : Not available.

CAS number/other identifiers

CAS number : Not applicable.

Product code : Not available.

Ingredient name	%	CAS number
Propane-1,2-diol Reaction mass of: 5-Chloro-2-methyl-4-isothiazolin-3-one [EC no. 247-500-7] and 2-Methyl-2H-isothiazol-3-one [EC no. 220-239-6] (3:1)	≥3 - ≤5 <0.06	57-55-6 55965-84-9

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

Description of necessary first aid measures

Eye contact : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 20 minutes. Get medical attention if irritation occurs.

Inhalation : Remove victim to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

Skin contact : Wash with plenty of soap and water. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 20 minutes. Get medical attention. In the event of any complaints or symptoms, avoid further exposure. Wash clothing before reuse. Clean shoes thoroughly before reuse.

Ingestion : Wash out mouth with water. Remove dentures if any. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Get medical attention if adverse health effects persist or are severe. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : No known significant effects or critical hazards.

Inhalation : No known significant effects or critical hazards.

Section 4. First aid measures

Skin contact : May cause an allergic skin reaction.

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : No known significant effects or critical hazards.

Inhalation : No known significant effects or critical hazards.

Skin contact : Adverse symptoms may include the following:
irritation
redness

Ingestion : No known significant effects or critical hazards.

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : In case of fire, use water spray (fog), foam, dry chemical or CO_2.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : No specific fire or explosion hazard.

Hazardous thermal decomposition products : Decomposition products may include the following materials:
carbon dioxide
carbon monoxide

Special protective actions for fire-fighters : No special measures are required.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Section 6. Accidental release measures

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

Large spill : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8). Persons with a history of skin sensitization problems should not be employed in any process in which this product is used. Do not get in eyes or on skin or clothing. Do not ingest. Avoid breathing vapor or mist. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Empty containers retain product residue and can be hazardous. Do not reuse container.

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
Propane-1,2-diol	**AIHA WEEL (United States, 10/2011).** TWA: 10 mg/m³ 8 hours.
Reaction mass of: 5-Chloro-2-methyl-4-isothiazolin-3-one [EC no. 247-500-7] and 2-Methyl-2H-isothiazol-3-one [EC no. 220-239-6] (3:1)	None.

Appropriate engineering controls : Good general ventilation should be sufficient to control worker exposure to airborne contaminants.

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation.

Section 8. Exposure controls/personal protection

Individual protection measures

Hygiene measures : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Contaminated work clothing should not be allowed out of the workplace. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: safety glasses with side-shields.

Skin protection

Hand protection : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Body protection : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection : Based on the hazard and potential for exposure, select a respirator that meets the appropriate standard or certification. Respirators must be used according to a respiratory protection program to ensure proper fitting, training, and other important aspects of use.

Section 9. Physical and chemical properties

Appearance

Physical state : Liquid. [Viscous.]

Color : Brown/Red

Odor : Not available.

Odor threshold : Not available.

pH : 8 to 9

Melting point : Not available.

Boiling point : Not available.

Flash point : Not available.

Evaporation rate : Not available.

Flammability (solid, gas) : Not available.

Lower and upper explosive (flammable) limits : Not available.

Vapor pressure : Not available.

Vapor density : Not available.

Relative density : 1.02

Solubility : Easily soluble in the following materials: cold water and hot water.

Partition coefficient: n-octanol/water : Not available.

Section 9. Physical and chemical properties

Auto-ignition temperature : Not available.

Decomposition temperature : Not available.

Viscosity : Not available.

VOC content : 171.907 g/L

Section 10. Stability and reactivity

Reactivity : No specific test data related to reactivity available for this product or its ingredients.

Chemical stability : The product is stable.

Possibility of hazardous reactions : Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid : Protect from freezing.

Incompatible materials : Reactive or incompatible with the following materials: oxidizing materials.

Hazardous decomposition products : Under normal conditions of storage and use, hazardous decomposition products should not be produced.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Propane-1,2-diol Reaction mass of: 5-Chloro-2-methyl-4-isothiazolin-3-one [EC no. 247-500-7] and 2-Methyl-2H-isothiazol-3-one [EC no. 220-239-6] (3:1)	LD50 Dermal LD50 Oral LD50 Oral	Rabbit Rat Rat	20800 mg/kg 20 g/kg 53 mg/kg	- - -

Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
Propane-1,2-diol	Eyes - Mild irritant Eyes - Mild irritant	Rabbit Rabbit	- -	24 hours 500 mg 100 mg	- -

Sensitization

There is no data available.

Mutagenicity

There is no data available.

Carcinogenicity

There is no data available.

Reproductive toxicity

There is no data available.

Teratogenicity

There is no data available.

Specific target organ toxicity (single exposure)

There is no data available.

Section 11. Toxicological information

Specific target organ toxicity (repeated exposure)

There is no data available.

Aspiration hazard

There is no data available.

Information on the likely routes of exposure : Dermal contact. Eye contact. Inhalation. Ingestion.

Potential acute health effects

Eye contact : No known significant effects or critical hazards.

Inhalation : No known significant effects or critical hazards.

Skin contact : May cause an allergic skin reaction.

Ingestion : No known significant effects or critical hazards.

Symptoms related to the physical, chemical and toxicological characteristics

Eye contact : No known significant effects or critical hazards.

Inhalation : No known significant effects or critical hazards.

Skin contact : Adverse symptoms may include the following:
irritation
redness

Ingestion : No known significant effects or critical hazards.

Delayed and immediate effects and also chronic effects from short and long term exposure

Short term exposure

Potential immediate effects : No known significant effects or critical hazards.

Potential delayed effects : No known significant effects or critical hazards.

Long term exposure

Potential immediate effects : No known significant effects or critical hazards.

Potential delayed effects : No known significant effects or critical hazards.

Potential chronic health effects

General : Once sensitized, a severe allergic reaction may occur when subsequently exposed to very low levels.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Teratogenicity : No known significant effects or critical hazards.

Developmental effects : No known significant effects or critical hazards.

Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

There is no data available.

Section 12. Ecological information

Toxicity

Product/ingredient name	Result	Species	Exposure
Propane-1,2-diol	Acute EC50 >110 ppm Fresh water Acute LC50 1020000 µg/L Fresh water Acute LC50 710000 µg/L Fresh water	Daphnia - Daphnia magna Crustaceans - Ceriodaphnia dubia Fish - Pimephales promelas	48 hours 48 hours 96 hours

Persistence and degradability

There is no data available.

Bioaccumulative potential

Product/ingredient name	$LogP_{ow}$	BCF	Potential
Propane-1,2-diol	-1.07	-	low

Mobility in soil

Soil/water partition coefficient (K_{OC}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling empty containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Section 14. Transport information

	DOT Classification	IMDG	IATA
UN number	Not regulated.	Not regulated.	Not regulated.
UN proper shipping name	-	-	-
Transport hazard class(es)	-	-	-
Packing group	-	-	-
Environmental hazards	No.	No.	No.

Section 14. Transport information

Additional information	-	-	-

AERG : Not applicable.

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Section 15. Regulatory information

U.S. Federal regulations : **TSCA 8(a) PAIR**: Poly(oxy-1,2-ethanediyl), α-[4-(1,1,3,3-tetramethylbutyl)phenyl]-ω-hydroxy-; Poly(oxy-1,2-ethanediyl), α-[(1,1,3,3-tetramethylbutyl)phenyl]-ω-hydroxy-

TSCA 8(a) CDR Exempt/Partial exemption: Not determined

Commerce control list precursor: 2,2',2"-Nitrilotriethanol

United States inventory (TSCA 8b): All components are listed or exempted.

Clean Water Act (CWA) 311: Propionic acid; Propylene oxide

Clean Air Act Section 112 (b) Hazardous Air Pollutants (HAPs) : Listed

Clean Air Act Section 602 Class I Substances : Not listed

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

SARA 302/304

Composition/information on ingredients

Name	%	EHS	SARA 302 TPQ (lbs)	SARA 302 TPQ (gallons)	SARA 304 RQ (lbs)	SARA 304 RQ (gallons)
Hydrazine	<0.001	Yes.	1000	119.9	1	0.12
Ethylene oxide	<0.1	Yes.	1000	-	10	-
Propylene oxide	<0.1	Yes.	10000	1444.3	100	14.4

SARA 304 RQ : 3958105.4 lbs / 1796979.8 kg [465403.8 gal / 1761744.9 L]

SARA 311/312

Classification : Immediate (acute) health hazard

Composition/information on ingredients

Name	%	Fire hazard	Sudden release of pressure	Reactive	Immediate (acute) health hazard	Delayed (chronic) health hazard
Propane-1,2-diol	≥3 - ≤5	No.	No.	No.	Yes.	No.
Reaction mass of: 5-Chloro-2-methyl-4-isothiazolin-3-one [EC no. 247-500-7] and 2-Methyl-2H-isothiazol-3-one [EC no. 220-239-6] (3:1)	<0.06	No.	No.	No.	Yes.	No.

Section 15. Regulatory information

SARA 313

There is no data available.

State regulations

Massachusetts : None of the components are listed.

New York : None of the components are listed.

New Jersey : The following components are listed: Propane-1,2-diol

Pennsylvania : The following components are listed: Propane-1,2-diol

California Prop. 65

WARNING: This product contains less than 0.1% of a chemical known to the State of California to cause cancer.
WARNING: This product contains less than 1% of a chemical known to the State of California to cause birth defects or other reproductive harm.

Ingredient name	Cancer	Reproductive	No significant risk level	Maximum acceptable dosage level
Hydrazine	Yes.	No.	Yes.	No.
Ethanediol	No.	Yes.	No.	No.
1,4-Dioxane	Yes.	No.	Yes.	No.
Ethylene oxide	Yes.	Yes.	Yes.	Yes.
Propylene oxide	Yes.	No.	No.	No.

Section 16. Other information

Procedure used to derive the classification

Classification	Justification
SKIN SENSITIZATION - Category 1	Calculation method

History

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Date of previous issue : 05/30/2014

Version : 2

Prepared by : KMK Regulatory Services Inc.

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.
Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.