



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

March 29, 2005

Russell J. Morgan  
Laboratory Supervisor  
ELEMENTIS Chromium LP  
3800 Buddy Lawrence Drive  
Corpus Christi, TX 78407

Subject: Sodium Bichromate Solution  
EPA Registration Number 75449-3  
Application Date: February 4, 2005  
EPA Received Date: February 24, 2005

Dear Mr. Morgan:

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

**Proposed Amendment**

- Revised labeling

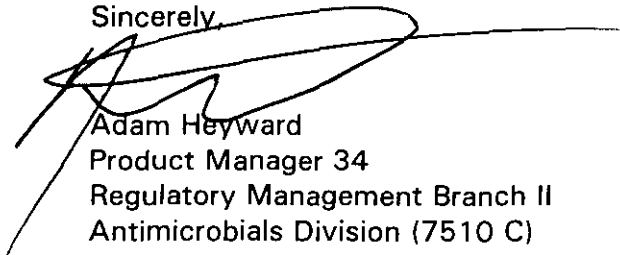
**Label Comments**

- Add the word 'DANGER' to the precautionary statement heading.

A stamped copy of the accepted labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling

Should you have any questions or comments concerning this letter, please contact me at 703-308-6422.

Sincerely,



Adam Hayward  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510 C)

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**RESTRICTED USE PESTICIDE**

**Due to Oncogenicity**

For sale to and use only by certified applicators or by persons under their direct supervision and only for those uses covered by the certified applicator's certification.

# *Elementis Chromium*

## **Sodium Bichromate Solution 69%**

FOR USE AS A WOOD PRESERVATIVE IN COMMERCIAL WOOD TREATING PLANTS  
 CAS NO. 7789-12-0

**ACTIVE INGREDIENT:**  
 Sodium Dichromate Dihydrate (Na<sub>2</sub>Cr<sub>2</sub>O<sub>7</sub>·2H<sub>2</sub>O)..... 69%  
**INERT INGREDIENTS**..... 31%  
100%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**  **POISON**

**Comment:** "Danger", "Poison", skull and crossbones are all in Red

| <b>FIRST AID</b>  |  |
|---|--|
| If in eyes  | <ul style="list-style-type: none"> <li>• Hold eye open and immediately rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor <u>immediately</u> for treatment advice.</li> </ul> |
| If on skin or clothing  | <ul style="list-style-type: none"> <li>• <u>Immediately</u> take off contaminated clothing.</li> <li>• Rinse skin <u>immediately</u> with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor <u>immediately</u> for treatment advice.</li> </ul>   |
| If swallowed  | <ul style="list-style-type: none"> <li>• Call poison control center or doctor <u>immediately</u> for treatment advice.</li> <li>• Do not induce vomiting.</li> <li>• Do not give anything by mouth to an unconscious person.</li> <li>• Give large quantities of water. (If available, give several glasses of milk.)</li> </ul>       |
| If inhaled:   | <ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>                               |
| <b>For 24-hour assistance, call Chemtrec at 1-800-424-9300.</b>   |  |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment.  |  |
| <b>NOTE TO PHYSICIAN</b>  |  |
| Get Input from a Physician Massive overexposure to solutions of this product can lead to kidney failure, liver damage, and death. Death has been avoided in several such cases through the use of early renal dialysis. An effective treatment has been shown to be immediate administration of 5-10 grams ascorbic acid (dissolved in water) by mouth or intravenously followed by 1000 mg three times a day for 14 days. Skin ulcers may be treated by removal from exposure, daily cleansing and debridement, and application of antibiotic creme and dressing to prevent further exposure or contamination. |  |

**SEE THE RIGHT SIDE PANEL FOR PRECAUTIONARY STATEMENTS AND ADDITIONAL INFORMATION.**

ACCEPTED  
 with COMMENTS  
 to EPA Label dated

MAR 29 2005

Under the authority of the Administrator  
 of the Environmental Protection Agency  
 and in accordance with the provisions of  
 registered under EPA Reg. No.

75449-3

3 7 9

Sodium Bichromate Solution 69% (EPA Reg. No. 75449-3)  
Label Amendment (railcars & tank trucks – printed on both sides of heavy card stock)  
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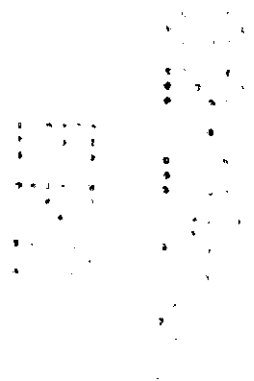
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Made in USA by:  
Elementis Chromium LP  
3800 Buddy Lawrence Drive  
Corpus Christi, TX 78407  
361-883-6421

EPA Reg. No. 75449-3  
EPA Est. No. 75449-NC-1

**HMIS RATING**  
**SYSTEM:**  
**Health 3\***  
**Flammability 0**  
**Reactivity 1**

**NET WEIGHT:**     15 Tons     60 Tons



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### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

- MAY CAUSE PERMANENT EYE INJURY AND BLINDNESS.
  - MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN.
  - CONTACT WITH BROKEN SKIN MAY RESULT IN ULCERS.
  - MAY CAUSE KIDNEY AND LIVER DAMAGE IF INHALED, SWALLOWED, OR ABSORBED THROUGH SKIN.
  - PROLONGED OR REPEATED BREATHING MAY CAUSE ULCERATION OR PERFORATION OF NASAL MEMBRANES.
  - PROLONGED OR FREQUENT REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.
  - MAY CAUSE CANCER. RISK OF CANCER DEPENDS ON DURATION AND LEVEL OF EXPOSURE.
- 
- Do not get in eyes, on skin, or on clothing.
  - Do not breath mist or dust.
  - When the possibility of exposure exists, wear:
    - MSHA/NIOSH-approved filter respirator for dusts, mists and particulates in accordance with the requirements of 29 CFR 1910.134.
    - Close fitting chemical safety goggles;
    - Chemical resistant gloves such as PVC or nitrile; and
    - Impervious coveralls and footwear or other full body protective clothing.
    - Hard hat
  - Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using toilet facilities.
  - Remove contaminated clothing and footwear and thoroughly wash before reuse, or discard.

Use of this product may be hazardous to your health. This product contains chromium compounds which have been determined to cause tumors in humans. Risks can be reduced by closely following the use directions and precautions and by properly using the protective clothing and equipment listed elsewhere on the label.

Applicators must wear gloves impervious to the wood treatment formulation in all situations where dermal contact is expected (e.g., handling freshly treated wood and manually opening cylinder doors). Applicators must not eat, drink, or use tobacco products during those parts of the applications process that may expose them to the wood treatment formulation (e.g., cylinders, mixing chemicals, and handling freshly treated wood).

Wash thoroughly after skin contact, and before eating, drinking, use of tobacco products or using restrooms. Individuals who enter pressure treatment cylinders and other related equipment that is contaminated with the wood treatment solution (e.g., cylinders that are in operation or are not free of the treatment solution) must wear protective clothing, including overalls, jacket, gloves, and boots, impervious to the wood treatment formulations. In addition, individuals who enter pressure-treatment cylinders must wear properly fitting, well-maintained, high-efficiency filter respirators (MSHA/NIOSH-approved for inorganic arsenic) if the level of inorganic arsenic in the plant is unknown or exceeds 10 micrograms per cubic meter of air (10ug/m<sup>3</sup>) averaged over an 8-hour work period.

Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and work shoes or boots and equipment at the plant. Worn-out protective clothing and work shoes or boots must be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.

Individuals in the work area of an arsenical wood treatment plant must wear properly fitting, well-maintained high efficiency filter respirators, MSHA/NIOSH approved for inorganic arsenic, if the level of inorganic arsenic in the plant is unknown or exceeds 10 micrograms per cubic meter of air (10ug/m<sup>3</sup>) averaged over an 8-hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

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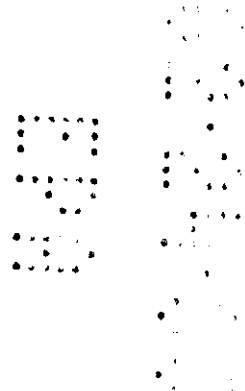
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Note to user-Examples of acceptable materials for protective clothing (e.g., gloves, overalls, jacket, and boots) required during application and handling of inorganic arsenicals are vinyl, polyvinyl chloride (PVC), neoprene, NBR (Buna-N) rubber, and polyethylene.

**ENVIRONMENTAL HAZARD**

This pesticide is toxic to fish and aquatic organisms. 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 Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of EPA.



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**PHYSICAL OR CHEMICAL HAZARD**

**OXIDIZING AGENT.** Mildly oxidizing in solution but becomes strongly oxidizing in strong acidic solution. Sodium dichromate reacts strongly with materials which are readily oxidized. Combustion can be violent with finely divided oxidizable substances. Oxidizing capability may also sustain a fire involving easily oxidizable material. Thermal decomposition begins at 400°C and may produce oxygen, toxic Na<sub>2</sub>O and chromic oxides.

**IN CASE OF FIRE:** Product is nonflammable. Use media appropriate for surrounding fire. Firefighters should wear NIOSH/MSHA-approved self-contained breathing apparatus in positive pressure mode and bunker gear. Additional protective clothing may be necessary to prevent exposure.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Local exhaust ventilation with partial enclosure should be employed for processes likely to generate dust, fume or mist/spray. Use precautions to ensure that the environmental controls are adequate to maintain the permissible exposure limits applicable to this product and/or its reaction products. Emergency shower and quick drench eye wash station must be in close proximity to work area.

**RESTRICTED USE PESTICIDE**

Sodium Dichromate Solution 69% is an end-use product to be used to formulate CCA Type A and Type C Wood Preservative Solutions when tank mixed with copper sulfate solution and arsenic acid at the use site by commercial wood treatment establishments.

The solutions are to be impregnated into forest products, such as lumber, timber, post, poles and piles using a vacuum pressurized system.

**CCA TYPE C INSTRUCTIONS**

For a 1.5% working solution to one thousand gallons of water, add 32 gallons of 25% copper sulfate solution. Add 10 gallons of Sodium Dichromate Solution 69%. The final component to be added is 4.9 gallons of arsenic acid 75%.

**CCA TYPE A INSTRUCTIONS**

For a 1.5% working solution to one thousand gallons of water, add 30 gallons of 25% copper sulfate solution. Add 13 gallons of Sodium Dichromate Solution 69%. The final component to be added is 2.6 gallons of arsenic acid 75%.

This is an end-use product intended to be tank-mixed at the use site by commercial wood treating establishments. The contents, which are for use only in pressure treating cylinders for forest products, cannot be used in concentrated form. Do not attempt to use without implementing the necessary safety equipment. To be used only in impregnation of forest products utilizing water solutions having concentrations ranging from 0.5% to 10% by weight. Impregnation procedures must rigidly adhere to the current standards of the American Wood Preservers Association, as they pertain to type of wood products, wood species, penetration and retention levels, and other treatment method details.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by the use, storage or disposal of this product.

**STORAGE:** OXIDIZING AGENT. PROTECT CONTAINERS FROM PHYSICAL DAMAGE AND CONTAMINATION. Store away from heat, ignitions sources, combustible, organic or other readily oxidizable materials, e.g., wood, paper, and greases. Keep container tightly closed when not in use.

**PRODUCT AND RINSATE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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. Reclaim if possible. The preferred disposal method is chemical treatment (reduction and neutralization) in accordance with Federal, State and local authorities. Conduct disposal according to 40 CFR Part 261 and 262.

**SPILLS:**

- CONTAIN SPILL AND CLEAN AREA IMMEDIATELY TO PREVENT DISPERSION OF AIRBORNE MISTS AND DUSTS.
- NEVER FLUSH TO SEWER OR WATERWAYS.
- Isolate hazard area and deny entry to unauthorized and unprotected personnel. Use only qualified, trained responders wearing appropriate personal protective equipment.

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- Dike/absorb spilled liquid material with suitable inert sorbent (i.e., sand, soil, vermiculite) and place recovered liquid in a clean closable, labeled container for later recycle or disposal.
- Clean residual spilled product using wet clean-up method (i.e., misting, etc.) or by a vacuum equipped with a High Efficiency Particulate (HEPA) filter.
- Treat spill area "in-situ" with a reducing agent (a solution of sodium bisulfite, sodium sulfite, ferrous sulfate or ferrous chloride) to convert hexavalent chromium to trivalent chromium.
- Adjust the pH of the treated area to neutral with a weak base (sodium bicarbonate, soda ash, or lime).
- Dispose of wastes through an approved Waste Contractor and in accordance with all applicable regulations.
- Report spills as appropriate to Federal, State and local authorities. Reportable quantity is 10 lbs. (40 CFR 117.3). NOTE: Treatment of recovered product, contaminated soil and debris may be considered "hazardous waste treatment" and must only be done with appropriate regulatory agency approval and permits.

**CONTAINER: DISPOSAL:** Return empty tank cars and tank trucks in compliance with applicable DOT regulations.

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### ADDITIONAL LABELING INSTRUCTIONS

#### **IMPLEMENTATION OF THE PERMISSIBLE EXPOSURE LIMIT (PEL) MONITORING PROGRAM**

Each arsenical wood treatment plant employer shall require all employees potentially exposed to airborne inorganic arsenic to wear properly fitting, well maintained, high efficiency filter respirators, MSHA/NIOSH-approved for inorganic arsenic for the entire period that the employees are in the treatment application work area or engaged in any activity associated with the treatment process. Alternatively, to potentially relieve employees from the burden of wearing respirators, the employer may implement a Permissible Exposure Limit (PEL) Monitoring Program. This requirement became effective on July 10 1986. Any plant which begins operations after April 10, 1986 will have 3 months from the date of initial operation to implement this program. All wood treatment plant employers who elect to implement the PEL monitoring program must determine the current levels of airborne arsenic, averaged over an 8-hour period, to which their employees are exposed. Monitoring data must be obtained in the same manner as described below under "Monitoring and Measurements Procedures".

If the initial or subsequent monitoring demonstrates that airborne inorganic arsenic in a work area is greater than 10ug/m<sup>3</sup>, all employees working in that area are required to wear properly fitting, well-maintained, high efficiency filter respirators, MSHA/NIOSH approved for inorganic arsenic. If in subsequent monitoring, at least two consecutive measurements taken at least 7 days apart, the inorganic arsenic levels are below 10ug/m<sup>3</sup> but above 5ug/m<sup>3</sup>, the employer shall repeat monitoring at least every 6 months until at least two consecutive measurements, taken at least 7 days apart, are below 5ug/m<sup>3</sup>. The employer may then discontinue monitoring except as discussed in the "PEL Checklist" below.

#### **PEL CHECKLIST**

In all cases where there has been a change in production, process, control, or employee handling procedures, or if any events in the PEL Checklist occurred, or if, for any other reasons an employer should suspect new or additional airborne inorganic arsenic, additional monitoring that complies with the requirements for initial monitoring shall be completed. Responses to the Checklist will become part of the monitoring records. Monitoring is required within 3 months if any of the following events/questions on the checklist can be answered in the affirmative with respect to any events which may have occurred since the last monitoring report submitted to the Agency.

1. After the wood has been treated, have you changed from hand stacking to mechanical stacking or from mechanical stacking to hand stacking? If yes, when?
2. Has your production capacity increased significantly? If yes, when?
3. Have you changed from a ready-to-use or diluted concentration to a mix-it-yourself formulation? Has the proportional amount of arsenic in the solution increased, e.g., have you shifted from CCA Type A or C to Type B? If yes, when?
4. Has a significant (i.e., reportable under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 [Superfund], 42 U.S.C. 9601 et seq.) spill occurred? If yes, when?
5. Is treated wood being retained on the drip pad for less time? If yes, when?
6. Have there been any other production, process, control or employee handling procedure changes which could result in new or additional airborne inorganic arsenic? Identify change, and when it occurred.

#### **MONITORING AND MEASUREMENT PROCEDURES**

The employer shall collect personal air samples, including at least one sample which is adequate to represent typical conditions for a full work shift (at least 7 hours) for each job classification in each work area. Sampling should be done using a personal sampling pump calibrated at a flow rate of 2 liters per minute. Samples should be collected on 0.8 micrometer pore size membrane filters (37mm diameter). The method of sampling analysis should have an accuracy of not less than + or -25 percent (with a confidence limit of 95 percent) for 10 micrograms per cubic meter of air (10ug/m<sup>3</sup>), and + or -35 percent (with a confidence limit of 95 percent) for concentrations of inorganic arsenic between 5 and 10ug/m<sup>3</sup>.

Monitoring may be conducted through a request made to the Occupational Safety and Health Administration (OSHA) for monitoring assistance, which may be provided free of charge under the terms of the OSHA consultation program as provided under section 7(c)(1) of the OSHA Act, or by employees or contractors of the employer's choosing. The Environmental Protection Agency (EPA) may direct that remonitoring take place at statistically selected establishments to assure that the Checklist is effective in identifying events which increase airborne arsenic. Selected employers will be notified by EPA/State enforcement representatives. The employer will be responsible for obtaining current air monitoring data



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within the time specified in the remonitoring notification and for submitting these data and reports to the EPA as directed below.

**DATA SUBMISSION CERTIFICATION**

The employer shall establish and maintain accurate records which include response to the PEL Checklist and all monitoring which include responses to the PEL Checklist and all Monitoring reports. The annual records or copies thereof shall be submitted to the U.S. Environmental Protection Agency, Office of Pesticides and Toxic Substances Office of Compliance Monitoring (EN-342), 401 M. St., SW Washington, D.C. 20460. All records submitted will be certified by the employer as accurate and in compliance with all calibration, analytical and sampling requirements outlined in this program. If the employer received assistance from an OSHA 7(c)(1) consultant, that consultant's report to the employer will be an acceptable record of calibration, analysis, and monitoring requiring no additional certification.