

2829-120

1-28-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 28, 2003

Lynne Morgan Hall
Registration Manager, Plastics Additives
Rohm and Haas Company
100 Independence Mall West
Philadelphia, PA 19106-2399

Subject: OBPA
EPA Registration No. 2829-120
Application Date: November 21, 2002
EPA Received Date: December 3, 2002

Dear Ms. Hall:

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

Proposed Amendment

- Update First Aid Statement per PR Notice 2001-1

Conditions

Revise the label as follows:

1. Revise the "If Inhaled" section of the Precautionary Statements to read:

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.

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2. Revise the "Storage and Disposal" statements, per PR Notice 83-3, to read:

STORAGE AND DISPOSAL

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

Pesticide Storage: Do not store in the presence of food or feed. OBPA that cannot be used according to label instructions must be disposed of according to Federal or approved State procedures under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

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.

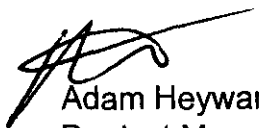
Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit one(1) copy 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 Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510 C)

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

**DANGER
CORROSIVE
CAUSES IRREVERSIBLE EYE DAMAGE
CAUSES SKIN IRRITATION
FATAL IF SWALLOWED OR ABSORBED
THROUGH THE SKIN**

Do not get in eyes, on skin, or on clothing. Wear goggles or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before re-use.

FIRST AID

Have product container or label with you when calling a poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 min. Remove contact lenses, if present, after first 5 min. then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15- 20 min.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth.
- Call a poison control center or doctor for further treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for advice.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Have person sip a glass of water if able to swallow.
- Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

OBPA

**Use Limited to Formulation into EPA
Registered Fungicides and Bacteriocides**

ACTIVE INGREDIENT:
10, 10' - Oxybisphenoxarsine 97.0%
(total arsenic 29%, water soluble AS 0.01%)
INERT INGREDIENTS: 3.0%
Total: 100.0%

KEEP OUT OF REACH OF CHILDREN



DANGER POISON

ACCEPTED
Made in China
with COMMENTS

EPA Letter Dated: Manufactured by Chemphy Chemicals Inc. for:

JAN 28 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
Registered under EPA Reg. No. 2829-120

**ROHM
HAAS**
100 INDEPENDENCE MALL WEST
PHILADELPHIA, PA 19106
TELEPHONE: (215) 592-3000

EPA Reg. No. 2829-120
EPA Est. No. 73467-CHN-001

Net Wt: 100.0 lb

SEE SIDE PANELS FOR PRECAUTIONARY STATEMENTS

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, birds and mammals. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

Do not store in the presence of food or feed. OBPA that cannot be used according to label instructions must be disposed of according to Federal or approved State procedures under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

CONTAINER DISPOSAL

Completely empty inner liner and consolidate all contaminated liners in a drum. Dispose of drum and inner liner as hazardous waste in accordance with RCRA. Crush any uncontaminated drums and incinerate.

DIRECTIONS FOR USE

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

OBPA is sold only for formulation into industrial fungicides and bacteriocides

NOTE: Formulators are responsible for providing supporting data for their formulations.

CONDITIONS OF SALE AND WARRANTY

Rohm and Haas warrants that this product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. ROHM AND HAAS MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES, EITHER OF MERCHANTABILITY OR FITNESS, FOR A PARTICULAR USE. Handling, storage, and use of the product by Buyer or User are beyond the control of Rohm and Haas and Seller. Risks such as ineffectiveness or other unintended consequences resulting from, but not limited to, failure to follow directions will be assumed by the Buyer or User. IN NO CASE WILL ROHM AND HAAS OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE, OR USE OF THIS PRODUCT.

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