

PM 21

10356-48

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9 002

Kirsten Springer
Legal Assistant
Steptoe & Johnson
1330 Connecticut Ave., N.W.
Washington, D.C. 20036-2503

Dear Ms. Springer:

Subject: CSI Arsenic Acid 75%
EPA Registration No. 10356-18
Revised Labeling
Your Letter Dated 1/30/92

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

Under "Environmental Hazards", delete the second and third sentences, as these do not apply to this type of product.

Sincerely Yours,



Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

BEST AVAILABLE COPY

CONCURRENCES

SYMBOL	<i>Handwritten</i>						
SURNAME	<i>Handwritten</i>						
DATE	<i>3-25-92</i>						

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

DANGER

Corrosive. Causes irreversible eye damage and skin burns. Fatal if swallowed, inhaled, or absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust or spray mist. Wear goggles or face shield, protective clothing, and rubber gloves. Contains Inorganic Arsenic. Handle only in well ventilated areas and use only with adequate ventilation or respiratory protection. See respiratory protection requirements under SPECIFIC USE INSTRUCTIONS. Self contained breathing apparatus should be worn when fighting fire involving this product.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and wildlife. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment wash waters. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or regional office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Arsenic can react with several metals, including galvanized metals and black iron. Do not use galvanized metal containers for this product since highly toxic arsine gas may be formed. Arsenic acid can be corrosive. Flush all equipment that comes in contact with arsenic acid with water immediately after use. Never use pressure to empty containers other than pressure cylinder.

DIRECTIONS FOR USE

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

**STORAGE AND DISPOSAL
PROHIBITIONS**

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

STORAGE

Do not store in tightly sealed, unlined metal containers (other than stainless steel) because of the possibility of hydrogen liberation and the development of excessive pressure.

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

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

SPILLS

Recover spilled liquid or neutralize with 10 lbs. lime per gallon of liquid. Sweep up or vacuum thoroughly to remove any remaining contaminated lime or soil. Consult federal, state or local disposal authorities for approved disposal procedures.

**BEST AVAILABLE COPY
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 applicators' certification.

CSI ARSENIC ACID 75%

FOR USE AS A WOOD PRESERVATIVE IN
COMMERCIAL WOOD TREATING PLANTS

ACTIVE INGREDIENT:

Arsenic Acid (H₃AsO₄) 75.0%

INERT INGREDIENTS 25.0%

TOTAL 100.0%

(Total arsenic, expressed as metallic, all in water soluble form—39.6% 15.7 lbs/gal.)

KEEP OUT OF REACH OF CHILDREN

Poison  Danger

Poisonous if swallowed, inhaled or absorbed through skin. Corrosive. Causes irreversible eye damage and skin burns. Refer to additional PRECAUTIONARY STATEMENTS.

**STATEMENT OF PRACTICAL TREATMENT
IF SWALLOWED:**

Call a physician at once. Dilute stomach contents by giving patients 2-4 glasses of milk or water. Induce vomiting by placing finger in throat. Repeat until vomit is clear. Give 4 oz. of milk of magnesia followed by whites of 2 eggs beaten in a glass of water or a glass of milk. Keep patients calm and warm to avoid shock. Never give anything by mouth to an unconscious person.

IF IN EYES:

Causes irreversible eye damage. Flush eyes for 15 minutes with plenty of water, preferably warm. Be sure to wash under eyelids. Call a physician.

IF ON SKIN:

Flush skin for 15 minutes with plenty of water, preferably warm. After flushing, wash skin with soap thoroughly. Get medical attention.

IF INHALED:

Remove from exposure. Administer artificial respiration if necessary if breathing is labored or breathing has stopped. Seek medical aid.

NOTE TO PHYSICIAN: For treatment see effects by ingestion.

Registered:



9 1992

Under the Fungicide Act of 1910 registered with 10356-18

Manufactured By:

Chemical Specialties, Inc.
One Woodlawn Green
Charlotte, North Carolina 28217

Phone 704/455-5181 in case of emergency.

EPA Reg. No. 10356-16

EPA Est. No. 10465-NC-2

EPA Est. No. 10356-GA-1

EPA Est. No. 10356-TX-1

Net Contents _____ lbs

POST A COPY OF THIS LABEL IN THE WORK AREA

SPECIFIC DIRECTIONS

CSI Arsenic Acid is an end-use product to be used as a preservative solution when tank-mixed with CSI Copper Sulfate Solution (EPA Reg. No. 10465-7) at the use site by commercial wood treating establishments.

CSI Arsenic Acid is also used as an end-use preservative solution when tank-mixed, as described in commercial wood treating establishments.

These solutions are to be impregnated into wood using a vacuum pressure system.

CCA TYPE

Using CSI Copper Sulfate Crystals
To 275 gallons of water, add 400 pounds (8,500 lbs) of CSI Sodium Dichromate. The final composition is 10% copper sulfate and 90% sodium dichromate.

Using CSI Copper Sulfate Solution
To 2,810 gallons of water, add 4,675 gallons of CSI Sodium Dichromate Solution. The final composition is 10% copper sulfate and 90% sodium dichromate.

CCA TYPE

Using CSI Copper Sulfate Crystals
To 292 gallons of water, add 400 pounds (8,500 lbs) of CSI Sodium Dichromate. The final composition is 10% copper sulfate and 90% sodium dichromate.

Using CSI Copper Sulfate Solution
To 2,558 gallons of water, add 4,675 gallons of CSI Sodium Dichromate Solution. The final composition is 10% copper sulfate and 90% sodium dichromate.

ACA IN

Using CSI 75% Arsenic Acid Solution
To 381 pounds (45.8 gallons) of water, add 381 lbs to a steel tank. Add 108.5 pounds of copper carbonate and 31.3 pounds of zinc oxide (99.7% ZnO) to 7.9 gallons of 75% arsenic acid solution with 4.7 lbs ammoniacal copper arsenate containing 7.47% arsenic.

ACZA I

Using CSI 75% Arsenic Acid Solution
To 472 pounds (56.7 gallons) of water add 292 lbs to a steel tank. Add 57.5 pounds of ammonium copper carbonate and 31.3 pounds of zinc oxide (99.7% ZnO) to 7.9 gallons of 75% arsenic acid solution with 4.7 lbs ammoniacal copper arsenate containing 6.25% CuO.

SPECIFIC USE

This is an end use product intended to be used in establishments. The contents, which are for use only, cannot be used in concentrated form. Do not use equipment. To be used only in impregnation of wood. Standards of the American Wood Preservers Association, penetration and retention levels, and protection against termites, ascomycetes, and fungi.

Use of this product may be hazardous to your health if you do not use it properly. Types of which have been associated with lung cancer, kidney damage, and other health effects. Use this product only in accordance with the use directions and precautions listed elsewhere on this label.

Applicators must wear gloves impervious to the product. Contact with the product is expected (e.g. handling freshly treated wood).

Individuals who enter pressure treatment cylinders with the wood treating solution (e.g. cylinders used for wood treatment) must wear protective clothing, including a respirator. In addition, individuals must use proper fitting, well maintained, high efficiency respirators if the level of inorganic arsenic in the plant air (10 µg/m³) averaged over an 8-hour work period.

Protective equipment must be changed when necessary and stored in a clean, dry place. Protective equipment and workshoes or boots and workshoes or boots must be left at the plant disposal and in accordance with state and federal regulations.

Individuals in the work area of an arsenical treated wood must wear high efficiency respirators. High efficiency respirators must be worn if the level of inorganic arsenic in the plant air (10 µg/m³) averaged over an 8-hour work period.

Note to user: Examples of acceptable materials for use during application and handling are: (PVC), neoprene, NBR (Buna N), rubber, and polyethylene.

Monitoring: Air monitoring programs, if conducted in accordance with the instructions, must be conducted in accordance with the instructions.

Applicators must not eat, drink, or use tobacco products that may expose them to the wood treatment solution. Wash thoroughly after skin contact, and before eating or drinking.

Processes used to apply inorganic arsenic to wood as defined by AWPA Standard C-1 and C-2 means a surface residue or crystallization of arsenic on otherwise clean wood shall be allowed.

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 operation after April 10, 1986 will have 3 months from the date of initial operation to implement this program.

All wood treatment plant employees 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 Measured Procedures". If the initial or subsequent monitoring demonstrates that airborne inorganic arsenic in a work area is greater than $10\mu\text{g}/\text{m}^3$, 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 $10\mu\text{g}/\text{m}^3$, employees in those areas may discontinue wearing the respirators except as discussed in the PEL Checklist below. However, if the employee exposure is below $10\mu\text{g}/\text{m}^3$ but above $5\mu\text{g}/\text{m}^3$, the employer shall repeat monitoring at least every 6 months until at least two consecutive measurements, taken at least 7 days apart, are $5\mu\text{g}/\text{m}^3$. The employer may then discontinue monitoring except as discussed in the PEL Checklist below.

If the monitoring reveals employees are exposed to airborne arsenic levels below $5\mu\text{g}/\text{m}^3$, monitoring need not be repeated 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 dilute concentrate to a mix-it-

yourself formulation? Has the proportional amounts of a increased, e.g., have you shifted from CCA Type A or C when?

4. Has a significant (i.e., reportable under the Comprehensive Response, Compensation, and Liability Act of 1980 (Superfund) spill occurred? If yes, when?
5. Is treated wood being retained on the drip pad for less time?
6. Have there been any other production, process control or handling procedure changes which could result in new or additional inorganic arsenic? Identify change and when it occurred.

MONITORING AND MEASUREMENT PROCEDURES

The Employer shall collect personal air samples, including at least one which is adequate to represent typical conditions for a full work shift 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 (Gelman). The method of sampling analysis should have an accuracy of ± 10 percent (with a confidence limit of 95 percent) for 10 micrograms per cubic meter ($10\mu\text{g}/\text{m}^3$) and ± 35 percent (with a confidence limit of 95 percent) for concentrations of inorganic arsenic between 5 and $10\mu\text{g}/\text{m}^3$.

Monitoring may be conducted through a request made to the Occupational Safety and Health Administration (OSHA) for monitoring assistance provided free of charge under the terms of the OSHA consultation program provided under section 7(c)(1) of the OSHA Act, or by the employer or other person of the employer's choosing.

The Environmental Protection Agency (EPA) may direct that the employer place at statistically selected establishments to assure that the chemical processes in the identifying events which increase airborne arsenic. Selected establishments shall be notified by EPA/State enforcement representatives. The employer shall be responsible for obtaining current air monitoring data within the time specified in the remonitoring notification and for submitting this data and report to the Agency as described below.

DATA SUBMISSION AND CERTIFICATION

The employer shall establish and maintain accurate records of responses to the PEL Checklist and all monitoring reports. The original copies thereof shall be submitted to the U.S. Environmental Protection Agency, Office of Pesticides and Toxic Substances, Office of Compliance and Enforcement (OPTE), 401 M Street, S.W., Washington, D.C. 20460. All records shall be certified by the employer as accurate and in compliance with all calibration and sampling requirements outlined in this program. If the employer receives assistance, from an OSHA 7(c)(1) consultant, that consultant's certification of the employer will be an acceptable record of calibration, analysis, and sampling, requiring no additional certification.

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