

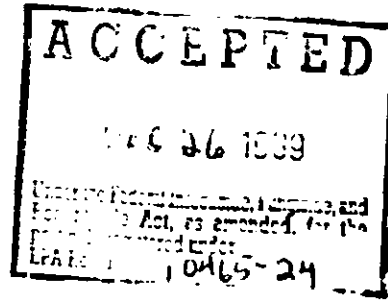
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RESTRICTED USE PESTICIDE

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 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 (This word will appear in red and the background will be white.)

(SKULL & CROSSBONES)

DANGER

Poisonous if swallowed!
Absorbed through skin causes skin irritation

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 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.

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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.

Manufactured by:

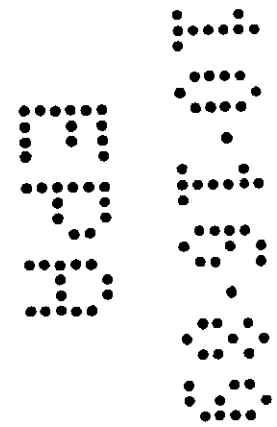
CSI
Charlotte, NC 28217

EPA Reg. No. 10465-

EPA Est. No.

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All the precautionary statements will be surrounded by a block outline.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage, skin or mucous membrane irritation. Harmful if swallowed. Do not swallow liquid or inhale contaminated dust or spray mist. Handle in well ventilated areas. Wash thoroughly with soap and water after handling.

Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves. 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 wetland (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment washwaters. 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 a 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.

CONTAINS INORGANIC ARSENIC

MAY BE FATAL IF INHALED, SWALLOWED OR ABSORBED THROUGH SKIN

CAUSES IRRITATION

USE ONLY WITH ADEQUATE VENTILATION OR RESPIRATORY PROTECTION

PHYSICAL OR CHEMICAL HAZARDS

Arsenic acid 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 vessels.

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.

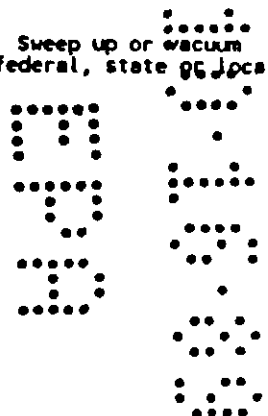
CONTAINER DISPOSAL

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 area thoroughly to remove any remaining contaminated lime or soil. Consult federal, state or local disposal authorities for approved disposal procedures.

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SPECIFIC DIRECTIONS FOR USE

CSI Arsenic Acid is an end-use product to be used to formulate a 20% CCA Type A or Type C wood preservative solution when tank-mixed with CSI Copper Sulfate Crystals (EPA Reg. No. 10465-22) or CSI Copper Sulfate Solution (EPA Reg. No. 10465-23) and CSI Sodium Dichromate (EPA Reg. No. 10465-) at the use site by commercial wood treating establishments.

CSI Arsenic Acid is also used as an end-use product to formulate ACA or ACZA wood preservative solutions when tank-mixed, as described per specific instructions as follows, at the use site by commercial wood treating establishments.

These solutions are to be impregnated into forest products, such as lumber, timber, posts, poles, and piles, using a vacuum pressure system.

TYPE C INSTRUCTIONS

Using CSI Copper Sulfate Crystals (EPA Reg. No. 10465-22):

To 275 gallons of water, add 400 pounds (8 50-pound bags) of CSI Copper Sulfate Crystals. Add 440 pounds (5 bags) of CSI Sodium Dichromate (EPA Reg. No. 10465-). The final component to be added is 1 400-pound drum of CSI Arsenic Acid.

Using CSI Copper Sulfate Solution (EPA Reg. No. 10465-23):

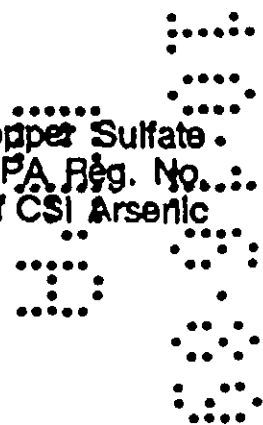
To 2,610 gallons of water, add 4,675 gallons of CSI Copper Sulfate Solution. Add 1,430 gallons of CSI Sodium Dichromate Solution (EPA Reg. No. 10465-). The final component to be added is 711 gallons of CSI Arsenic Acid.

TYPE A INSTRUCTIONS

Using CSI Copper Sulfate Crystals (EPA Reg. No. 10465-22):

To 292 gallons of water, add 400 pounds (8 bags) of CSI Copper Sulfate Crystals. Add 616 pounds (7 bags) of CSI Sodium Dichromate (EPA Reg. No. 10465-). The final component to be added is 1 225-pound drum of CSI Arsenic Acid.

Using CSI Copper Sulfate Solution (EPA Reg. No. 10465-23):



To 2,558 gallons of water, add 4,675 gallons of CSI Copper Sulfate Solution. Add 223 gallons of CSI Sodium Dichromate Solution (EPA Reg. No. 10465-). The final step is to add 341 gallons of CSI Arsenic Acid.

TYPE ACA INSTRUCTIONS

Using 75% Arsenic Acid Solution (10465-):

To 381 pounds (45.8 gallons) of water, add 386 pounds (51.5 gallons) aqueous ammonia (29% NH_3) to a steel tank. Add 108.5 pounds of copper carbonate (55% Cu) with continuous agitation. Slowly add 124 pounds (7.9 gallons) of 75% arsenic acid solution with agitation. This formula will yield 1000 pounds of ammoniacal copper arsenate containing 7.47% CuO and 7.53% As_2O_5 .

TYPE ACZA INSTRUCTIONS

Using CSI 75% Arsenic Acid Solution (10465-):

To 472 pounds (56.7 gallons) of water add 297 pounds (39.6 gallons) of ammonia solution (29% NH_3) to a steel tank. Add 57.5 pounds of ammonium bicarbonate and 90.8 pounds of copper carbonate (55% Cu) and 31.3 pounds of zinc oxide (99.7% ZnO) with continuous agitation. Slowly add 51.5 pounds (3.3 gallons) of 75% arsenic acid solution with agitation. This formula will yield 1000 pounds of ammoniacal copper zinc arsenate containing 6.25% CuO , 3.12% ZnO , and 3.12% As_2O_5 .

SPECIFIC USE INSTRUCTIONS

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 vessels 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. Treated wood is provided protection against termites, ascomycetes, brown rot, dry rot and white rot.

Use of this product may be hazardous to your health. This product contains arsenic compounds, some types of which have been associated with tumor development in humans. Risks can be reduced by closely following the use directions and precautions, and by properly using the protective equipment listed elsewhere on this 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).

Individuals who enter pressure treatment cylinders and other related equipment that is contaminated with the wood treating 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 formulation. 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 (10 ug/m³) averaged over an 8-hour work period.

Protective equipment must be changed when it shows signs of contamination. Applicators must leave protective equipment and workshoes or boots and equipment at the plant. Worn-out protective clothing and workshoes 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 (10 ug/m³) averaged over an 8-hour work period.

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.

Monitoring—Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

Applicators must not eat, drink, or use tobacco products during those parts of the application process that may expose them to the wood treatment formulation (e.g., manually opening/closing cylinder doors, moving trams out of cylinders, mixing chemicals, and handling freshly treated wood).

Wash thoroughly after skin contact, and before eating, drinking, use of tobacco products or using restrooms.

Processes used to apply inorganic arsenical formulations shall leave no visible surface deposits on the wood, as defined by AWPB Standard C-1 and AWPB Standards LP2 and LP22. (Visible surface deposits means a surface residue or crystallization on the treated wood. Small isolated or infrequent spots of chemical on otherwise clean wood shall be allowed.)

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LABELING FOR CSI ARSENIC ACID 75%

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 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 Measurement Procedures". If the initial or subsequent monitoring demonstrates that airborne inorganic arsenic in a work area is greater than 10ug/m³, 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/m³, employees in those areas may discontinue wearing the respirators except as discussed in the 'PEL Checklist' below. However, if the employee exposure is below 10ug/m³ but above 5ug/m³, the employer shall repeat monitoring at least every 6 months until at least two consecutive measurement, taken at least 7 days apart, are below 5ug/m³. 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 5ug/m³, 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,

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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 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 significant (i.e., reportable under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund), 42 U.S.C. 960 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 (37 mm diameter). The method of sampling analysis should have

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accuracy of not less than + or - 25 percent (with a confidence limit of 95 percent) for 10 micrograms per cubic meter of air (10ug/m³) and + or - 35 percent (with a confidence limit of 95 percent) for concentrations of inorganic arsenic between 5 and 10ug/m³.

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

DATA SUBMISSION AND CERTIFICATION

The employer shall establish and maintain accurate records which include responses to the PEL Checklist and all monitoring reports. The annual record or copies thereof shall be submitted to the U.S. Environmental Protection Agency, Office of Pesticides and Toxic Substances, Office of Compliance Monitoring (EN-0342), 401 M Street, S.W., 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.

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