

10465-25

11-20-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

November 20, 2003

Kevin J. Archer  
Product Development Manager  
CSI  
One Woodlawn Green  
Suite 250  
Charlotte, NC 28217

Subject: CSI 70% SODIUM DICHROMATE SOLUTION  
EPA Registration No. 10465-25  
Application Date: September 28, 2003  
EPA Received Date: October 2, 2003

Dear Dr. Archer:

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 Statements per PR Notice 2001-1

**Conditions**

Revise the label as follows:

1. Revise the First Aid Statements by including the following statement:

Note to Physician: Probable mucosal damage may contraindicate use of gastric lavage.

**CONCURRENCES**


SYMBOL	AS100							
SURNAME	Shay							
DATE	11-20-03							

**General Comments**

A stamped copy of the labeling accepted with conditions 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 Heyward  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510 C)

## PRECAUTIONARY STATEMENTS

### DANGER - POISON

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Fatal (poisonous) if swallowed or absorbed through skin. Do not breathe vapor, dust or spray mist. Do not get in eyes, on skin or on clothing. Corrosive, causes eye and skin damage. Wear goggles or a face shield and rubber gloves when handling. Use of the 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 this label.

#### PRECAUTIONS

Use adequate ventilation. Ventilation should be sufficient to limit employee exposure to sodium dichromate below the OSHA permissible exposure limit (0.5 mg/m<sup>3</sup> as Cr-8-hour TWA). Where ventilation is not adequate, use a NIOSH/MSHA-approved respirator. Wear goggles or a face shield, rubber gloves, rubber boots and a rubber apron when handling. Protective clothing should be worn and changed at least daily. Wash thoroughly after handling. Take a shower after work using plenty of water.

#### ENVIRONMENTAL HAZARDS

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.

#### SPECIFIC USE INSTRUCTIONS

End-use CCA solutions are for use only by certified applicators or by persons under their direct supervision and only for those uses covered by the certified applicator's certification.

Contents 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 the impregnation of forest products utilizing water solutions of chromated copper arsenate having oxide equivalent concentrations ranging from 0.5% to 10% by weight. Impregnation procedures must rigidly adhere to the current specifications of the American Wood Preservers Association. Treated wood is provided protection against termites, ascomycetes, brown rot, dry rot and white rot.

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 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 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/m<sup>3</sup>) averaged over an 8-hour work period. Air monitoring programs, procedures, record retention and submission must be conducted in accordance with the instructions provided with the inorganic arsenical component.

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 cylinder, mixing chemicals and handling freshly treated wood).

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

Protective clothing must be changed when it shows signs of contamination. Applicators must leave 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.

Processes used to apply CCA formulations shall leave no visible surface deposits on the wood, as defined by AWP 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 clear wood shall be allowed.)

Individuals in the work area of a CCA wood treatment plant must wear properly-fitting, well-maintained, high-efficiency 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/m<sup>3</sup>) averaged over an 8-hour work period.

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

#### Restricted Use Pesticide

TO ACUTE TOXICITY AND BECAUSE THIS PRODUCT CONTAINS ARSENIC AND/OR CHROMIUM COMPOUNDS SOME TYPES OF WHICH HAVE BEEN ASSOCIATED WITH TUMOR DEVELOPMENT IN HUMANS. For sale 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 70% SODIUM DICHROMATE SOLUTION

### For Use As A Wood Preservative in Commercial Wood Treatment Plants

#### ACTIVE INGREDIENTS:

Sodium Dichromate (Na<sub>2</sub>Cr<sub>2</sub>O<sub>7</sub>·2H<sub>2</sub>O) 70.0%

OTHER INGREDIENTS: 30.0%

TOTAL: 100.0%

WEIGHT OF SOLUTION 14.5 lbs./gal.

Before unloading, be sure hose is connected to the correct storage tank.

## KEEP OUT OF REACH OF CHILDREN

POISON  DANGER  
FIRST AID

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have 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.

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

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. 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 if possible. Call a poison control center or doctor for further treatment advice.

Refer to additional precautionary statements elsewhere on the label under the heading, "Precautionary Statements: Hazards to Humans and Domestic Animals".

Have the product container or label with you when calling a poison control center or doctor.

Manufactured By:  
**Chemical Specialties, Inc.**  
One Woodlawn Green, Suite 250  
Charlotte, North Carolina 28217

Phone 1-800-424-9300 (CHEMTREC) in case of  
emergency.

EPA Reg. No. 10465-25

EPA Est. No. 10465

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Net Contents \_\_\_\_\_ Lbs.

## POST A COPY OF THIS LABEL IN THE WORK AREA DIRECTIONS FOR USE

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

#### DIRECTIONS

CSI 70% Sodium Dichromate solution is to be used to formulate either a 20% CCA Type A or 20% CCA Type C end-use wood preservative solution when mixed with CSI Copper Sulfate Solution (EPA Reg. No. 10465-31) and CSI Arsenic Acid (EPA Reg. No. 10465-32). These solutions are to be impregnated into forest products, using a vacuum pressure system.

#### TYPE C INSTRUCTIONS

Using CSI Copper Sulfate Solution (EPA Reg. No. 10465-31): To 2,558 gallons of water, add 4,575 gallons of CSI Sodium Dichromate Solution. The final step is to add 351 gallons of CSI Arsenic Acid.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Do not store in close proximity to combustible materials. Store in tightly closed containers away from sources of heat.

**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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or by other procedures approved by state and local authorities.

**SPILLS:** Follow precautionary statements. Shovel or soak up spilled material into a plastic or steel container and reuse or remove to an approved chemical waste disposal area. Treat residue with reducing agent (e.g., sodium bisulfite), then neutralize with soda ash or lime; remove to an approved chemical waste disposal area. Flush area with water, directing runoff to appropriate treatment or disposal container. NEVER FLUSH TO SEWER.

#### WARRANTY

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

9/03

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 10465-25

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

NOV 20 2003

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