



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460**

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**July 11, 2003**

Mr. Kevin J. Archer  
Product Development and Regulatory Affairs Manager  
**Chemical Specialties, Inc.**  
200 E. Woodlawn Road  
Charlotte, NC 28217

Subject: **CSI Arsenic Acid 75%**  
EPA Registration No. 10465-32  
Letter dated May 15, 2003

Dear Mr. Archer:

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

**Proposed Amendment**

- Revised labeling

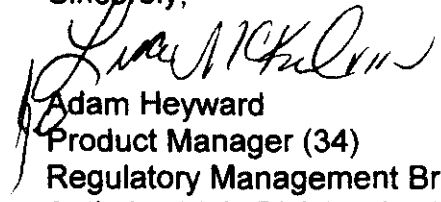
**General Comment**

1. Add the statement " This product is toxic to fish" at the beginning of the environmental hazards statement.
2. The first aid statement must be revised in accordance with PR Notice 2001-1 by October 1, 2003.

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

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,



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

Enclosure

**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 ventilated 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**

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.

**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.

**STORAGE AND DISPOSAL  
PROHIBITIONS**

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

**STORAGE**

This product must be stored 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 this waste 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**

For 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.

**DIRECTIONS FOR USE**

Effective December 31, 2003, this product may only be used (1) for formulation of the following end-use wood preservative products: ammoniacal copper zinc arsenate (ACZA) or chromated copper arsenate (CCA) labeled in accordance with the Directions for Use shown below, or (2) by persons other than the registrant, in combination with one or more other products to make: ACZA wood preservative; or CCA wood preservative that is used in accordance with the Directions for Use shown below.

Effective December 31, 2003, this product may only be used for preservative treatment of the following categories of forest products and in accordance with the respective cited standard (noted parenthetically) of the 2001 edition of the American Wood Preservers Association Standards: Lumber and Timber for Salt Water Use Only (C2), Piles (C3), Poles (C4), Plywood (C9), Wood for Highway Construction (C14), Poles, Piles and Posts Used as Structural Members on Farms, and Plywood Used on Farms (C16), Wood for Marine Construction (C18), Lumber and Plywood for Permanent Wood Foundations (C22), Round Poles and Posts Used in Building Construction (C23), Sawn Timber Used To Support Residential and Commercial Structures (C24), Sawn Crossarms (C25), Structural Glued Laminated Members and Laminations Before Gluing (C28), Structural Composite Lumber (C33), and Shakes and Shingles (C34). Forest products treated with this product may only be sold or distributed for uses within the AWPA Commodity Standards under which the treatment occurred.

**RESTRICTED USE PESTICIDE**

**DUE TO ACUTE TOXICITY AND BECAUSE THIS PRODUCT CONTAINS ARSENIC, SOME TYPES OF WHICH HAVE BEEN ASSOCIATED WITH TUMOR DEVELOPMENT IN HUMANS**

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

**CSI ARSENIC ACID 75%  
FOR USE AS A WOOD PRESERVATIVE IN  
COMMERCIAL WOOD TREATING PLANTS**

**ACTIVE INGREDIENTS**

Arsenic Acid (H<sub>3</sub>AsO<sub>4</sub>)..... 75.0%

INERT INGREDIENT..... 25.0%

TOTAL ..... 100.00%

Total arsenic, expressed as metallic, all in water soluble form - 39.6% 15.7 lbs. per gallon.

**KEEP OUT OF REACH OF CHILDREN**

**POISON DANGER**



May irritate eyes, nose, throat or burn through skin. Corrosive, causes irreversible eye damage and skin burns. For more information see the PRECAUTIONARY STATEMENTS.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Do not induce vomiting. Dilute stomach contents by giving patient 2-4 glasses of water. Do not give anything by mouth if patient is unconscious. Repeat until vomit is clear. Give 1 qt. of milk or water if patient is conscious. Do not give anything by mouth if patient is unconscious. Keep patient warm. Do not give anything by mouth if patient is unconscious.

**IF IN EYES:** Flush eyes for 15 minutes with plenty of water. preferably lukewarm. Do not use eye drops. Do not use eye ointment.

**IF ON SKIN:** Wash with plenty of water. If clothing is contaminated, remove it. Wash skin with soap and water. Do not use ointment.

**IF INHALED:** Remove patient to fresh air. If breathing is difficult, give oxygen. If breathing is not difficult, give artificial respiration if necessary. If breathing is not difficult, give artificial respiration if necessary.



Manufactured By:  
Chemical Specialties, Inc.  
200 East Woodlawn Road, Suite 250  
Charlotte NC 28217  
Email: [productinfo@chemspec.com](mailto:productinfo@chemspec.com)  
Phone 704-522-0825 in case of emergency

- EPA Reg. No. 10465-32
- EPA Est. No. 10465-NC-1
- EPA Est. No. 10465-GA-1
- EPA Est. No. 10465-TX-1

Net Contents: \_\_\_\_\_ lb.

**POST A COPY OF THIS LABEL IN THE WORK AREA**

**POST A COPY OF  
SPECIFIC**

CSI Arsenic Acid is an end-use product used when tank mixed with CSI Copper Sulfate Sol Reg. No. 10465-25) at the use site by commercial applicators. CSI Arsenic Acid is also used as an end-use product tank-mixed, as described per specific instructions at the establishments. These solutions are to be impregnated into floor surfaces by vacuum pressure system.

**CCA**  
Using CSI Copper Sulfate Crystals:  
To 275 gallons of water, add 400 pounds (8.5 lbs. per gallon) of Sodium Dichromate. The final component to be added is CSI Arsenic Acid.  
Using CSI Copper Sulfate Solution:  
To 292 gallons of water, add 4,675 gallons of CSI Arsenic Acid.

**CCA**  
Using CSI Copper Sulfate Crystals:  
To 292 gallons of water, add 400 pounds (8.5 lbs. per gallon) of Sodium Dichromate. The final component to be added is CSI Arsenic Acid.  
Using CSI Copper Sulfate Solution:  
To 2,558 gallons of water, add 4,675 gallons of CSI Arsenic Acid. The final step is to add 3

Using CSI 75% Arsenic Acid Solution:  
To 381 pounds (45.8 gallons) of water, add 300 pounds of copper carbonate arsenate (99.7% CuO and 7.53% As<sub>2</sub>O<sub>3</sub>).

Using CSI 75% Arsenic Acid Solution:  
To 472 pounds (56.7 gallons) of water add 210 pounds of zinc oxide (99.7% ZnO) with continuous agitation. This formula will contain 6.25% CuO, 3.12% ZnO and 3.12% As<sub>2</sub>O<sub>3</sub>.

**SPECIFIC USE INSTRUCTIONS**  
This is an end-use product intended to be tank mixed with CSI Copper Sulfate Solution. The contents, which are for use only in the concentrated form. Do not attempt to use with in impregnation of forest products utilizing water weight. Impregnation procedures must rigidly conform to the requirements of the Forest Products Association, as they pertain to type of wood and treatment method details. Treated wood is produced in white and red.

Use of this product may be hazardous to you and others. Read and understand all directions and precautions, and by properly using this product. Applicators must wear gloves impervious to the expected (e.g., handling freshly treated wood).

Individuals who enter pressure treatment cylinders containing solution (e.g., cylinders that are in operation), including overalls, jacket, gloves, and shoes, must be removed. Individuals who enter pressure-treatment cylinders must wear MSHA/NIOSH-approved for inorganic arsenic or exceeds 10 micrograms per cubic meter of air. Protective equipment must be changed when equipment and work shoes or boots and equipment must be left at the plant and disposed of in accordance with state and federal regulations.

Individuals in the work area of an arsenical wood preservative must wear MSHA/NIOSH-approved for inorganic arsenic or exceeds 10 micrograms per cubic meter of air. Protective equipment must be changed when equipment and work shoes or boots and equipment must be left at the plant and disposed of in accordance with state and federal regulations.

**Monitoring:** Air monitoring programs, procedures, and instructions of the attached label. Applicators must not eat, drink, or use tobacco products while working with wood preservative formulations, mixing chemicals, and handling fresh wood. Wash thoroughly after skin contact, and before eating or drinking. Processes used to apply inorganic arsenic formulations must be defined by AWPA Standard C-1. (Visible surface contamination or infrequent spots of chemical

ACCEPTED  
with COMMENTS  
EPA Label Database

JUL 11 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is registered under EPA Reg. No. 10465-32