



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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

November 19, 2003

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

Subject: CSI Arsenic Acid 75%  
EPA Registration No. 10465-32  
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:

**Proposed Amendment**

- Update First Aid Statements per PR Notice 2001-1

**General Comments**

A stamped copy of the accepted labeling is enclosed. 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)

CONCURRENCES

SYMBOL	7510C							
SURNAME	Archer							
DATE	11-19-03							

**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**

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.

**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), Round, Half Round and Quarter Round Fence Posts (C16), 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), Sawm Timber Used To Support Residential and Commercial Structures (C24), Sawm 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 use within the AWPA Commercial 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 - 38.8%, 15.7 lbs. per gallon.

**KEEP OUT OF REACH OF CHILDREN**



**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 when calling a poison control center or doctor.



Manufactured By:  
Chemical Specialties, Inc.  
200 East Woodlawn Road, Suite 250  
Charlotte NC 28217  
Email: [productinfo@chemspec.com](mailto:productinfo@chemspec.com)  
Phone 1-800-424-9300 (CHEMTREC) in case of emergency.

**ACCEPTED**

NOV 19 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this pesticide was analyzed, for the purpose registered under EPA Reg. No. 10465-32

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

lb.

**POST A COPY OF THIS LABEL IN A SPECIFIC LOCATION**

CSI Arsenic Acid is an end-use product used to treat wood when tank mixed with CSI Copper Sulfate Solution (EPA Reg. No. 10465-25) at the use site by commercial applicators. CSI Arsenic Acid is also used as an end-use product in tank-mixed, as described per specific instructions at the establishments.

These solutions are to be impregnated into forest products under vacuum pressure system.

**CCA TYPING**

Using CSI Copper Sulfate Crystals:  
To 275 gallons of water, add 400 pounds (8.50-pounds) Sodium Dichromate. The final component to be added is CSI Copper Sulfate Solution:  
To 292 gallons of water, add 4,675 gallons of CSI Arsenic Acid.

**CCA TYPING**

Using CSI Copper Sulfate Crystals:  
To 292 gallons of water, add 400 pounds (8.50-pounds) Sodium Dichromate. The final component to be added is CSI Copper Sulfate Solution:  
To 2,558 gallons of water, add 4,675 gallons of CSI Dichromate Solution. The final step is to add 341 pounds of CSI Arsenic Acid.

**ACZA TYPING**

Using CSI 75% Arsenic Acid Solution:  
To 381 pounds (45.8 gallons) of water, add 386 pounds of zinc oxide (99.7% ZnO) with continuous acid solution with agitation. This formula will yield arsenate containing 7.47% CuO and 7.53% As<sub>2</sub>O<sub>5</sub>.

**ACZ TYPING**

Using CSI 75% Arsenic Acid Solution:  
To 472 pounds (56.7 gallons) of water add 297 pounds of zinc oxide (99.7% ZnO) with continuous acid solution with agitation. This formula will yield arsenate containing 7.47% CuO and 7.53% As<sub>2</sub>O<sub>5</sub>.

**SPECIFIC USE INSTRUCTIONS**

This is an end-use product intended to be tank-mixed with CSI Copper Sulfate Solution (EPA Reg. No. 10465-25) at the use site by commercial applicators. Do not attempt to use without the impregnation of forest products utilizing water weight. Impregnation procedures must rigidly adhere to the procedures of the American Wood Preservers' Association, as they pertain to type of wood product, treatment method details. Treated wood is provided in a white and white rot.

Use of this product may be hazardous to you or your employees which have been associated with tumor development. Read the directions and precautions, and by properly using the product. Applicators must wear gloves impervious to the wood preservative (e.g., handling freshly treated wood and individuals who enter pressure treatment cylinders; treating solution (e.g., cylinders that are in operation, including overalls, jacket, gloves, and boots). Individuals who enter pressure-treatment cylinders must wear respirators (MSHA/NIOSH-approved for inorganic arsenic or exceeds 10 micrograms per cubic meter of air (10 µg/m<sup>3</sup>). Protective equipment must be changed when it is soiled and work shoes or boots and equipment boots 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 filter respirators. MSHA/NIOSH-approved for inorganic arsenic or exceeds 10 micrograms per cubic meter of air (10 µg/m<sup>3</sup>). Note to User: Examples of acceptable materials required during application and handling of inorganic arsenic (Buna-N), rubber, and polyethylene. Monitoring: Air monitoring programs, procedures, and the instructions of the attached label. Applicators must not eat, drink, or use tobacco while in the wood treatment formulation (e.g., cylinders, mixing chemicals, and handling freshly treated wood). Wash thoroughly after skin contact, and before eating or drinking. Processes used to apply inorganic arsenic form defined by AWPA Standard C-1. (Visible surface contamination or infrequent spots of chemical residue).