

10465-32

11/30/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

NOV 30 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Kevin J. Archer  
Chemical Specialties, Inc.  
5910 Pharr Mill Road  
Harrisburg NC 28075

Subject: CSI Arsenic Acid 75%  
EPA Registration Number: 10465-32  
Application Date: September 1, 2010  
Receipt Date: September 1, 2010

Dear Mr. Archer:

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

**Proposed Amendment:**

This is a conversion of an existing end use label to a manufacturing use label.

**Conditions**

Revise the label as follows:

- 1.) Revise the "Precautionary Statements" to read as follows:

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 clothing. Do not breathe dust or spray mist. *Wear goggles or face-shield; coveralls or long-sleeved shirt and long pants; socks and chemical resistant foot wear; and chemical resistant gloves in all situations where dermal contact is expected. Wear properly fitting, well maintained high efficiency filter respirators, MSHA/NIOSH approved for inorganic arsenic. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash before reuse. Vapors may cause injury if adequate ventilation is not insured. Use only with adequate engineering controls and ventilation where dust, mist, and hazardous by-product may be generated.*

Self contained breathing apparatus must be worn when fighting fire involving this product.

- 2.) Revise the "Environmental Hazards" statements by adding the statement, "This product is toxic to fish and wildlife."

- 3.) All pesticide products must have a "Note CONCURRENCE" if it is classified as category I for

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| DATE    |  |  |  |  |  |  |  |

any route of exposure. Therefore, add the following to the text immediately after the "First Aid" statements:

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

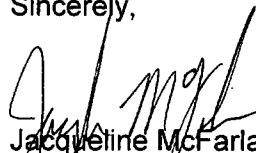
- 4.) Delete the "Open dumping is prohibited," statement under the "Storage and Disposal" heading and place it in the "Storage" instructions section.
- 5.) Revise the "Disposal" heading to read "*Pesticide Disposal.*"

**General Comments:**

A copy of the labeling accepted with conditions is enclosed for your files. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have further questions concerning this letter, please contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Killian Swift by telephone at (703) 308-6346 or by email at [swift.killian@epa.gov](mailto:swift.killian@epa.gov). When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Jacqueline McFarlane  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosure: EPA stamped label

| CONCURRENCES |  |  |  |  |  |  |  |
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| SURNAME      |  |  |  |  |  |  |  |
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**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**DANGER**

**Corrosive.** Causes irreversible eye damage, skin burns and mucous membrane irritation. 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. Wear a mask or pesticide air purifying respirator equipped with a high efficiency filter jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health. Handle only in well ventilated areas and use only with adequate ventilated or respiratory protection. 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.

**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 the manufacture of wood treating products)**

**CSI ARSENIC ACID 75%  
FOR MANUFACTURING USE ONLY**

**ACTIVE INGREDIENTS**

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

**INERT INGREDIENTS**

25.0%

**TOTAL**

100.0%

*Total arsenic, expressed as metallic, all in water soluble form - 39.6%.  
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, or when going for treatment.



Manufactured By:  
Chemical Specialties, Inc.  
5910 Pharr Mill Road  
Harrisburg, NC 28075  
Email: [productinfo@chemspec.com](mailto:productinfo@chemspec.com)

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

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

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

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

**DIRECTIONS FOR USE**

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

Only for formulation as a preservative for the following uses: (1) end-use wood preservative ammoniacal copper zinc arsenate (ACZA) or (2) for end-use chromated copper arsenate (CCA) wood preservative.

This product may be used to formulate products for additional use(s) not listed on the MUP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

**STORAGE AND DISPOSAL**

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

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

NOV 3 0 2010

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
attended for the pesticide,  
registered under EPA Reg. No.

10465-32

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