

10465-41

11-28-2003

1/3



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: CHROMIC ACID
EPA Registration No. 10465-41
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 Environmental Hazards Statement by changing the phrase "...lakes, streams, oceans or other waters..." to read "...lakes, streams, ponds, estuaries, oceans or other waters..."

CONCURRENCES

SYMBOL	7510c						
SURNAME	Gray						
DATE	11-20-03						

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

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

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. ~~Submit three(3)~~ 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
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. Wear goggles or face shield, protective clothing, and rubber gloves. Use only with ventilation sufficient to limit exposure below OSHA permissible exposure limit applicable to Chromic Acid and/or reaction products. See respiratory protection requirements under SPECIFIC USE INSTRUCTIONS. 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 discharge effluent containing this product into lakes, streams, 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. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Chromic Acid is combustion promoting and burns with other combustible materials even in the absence of air. Contact with combustible materials may cause fire. This product is a strong oxidizing agent. It may react with other oxidizable materials especially at elevated temperatures. Both in dry form and in solution this material may violently react with organic materials such as grease and oil especially in a confined space.

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: Keep container closed when not in use. Store away from combustible materials and other chemicals. Do not recycle or reuse container. Store at less than 100°C in a dry, well ventilated area and away from reducing agents, and materials that are combustible or flammable.

DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If 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: Avoid formation of dust. Carefully shovel or sweep spilled dry material into a closed metal container for reclamation or disposal. Spilled liquid material should be contained, absorbed with an inert absorbent such as vermiculite, sand or soil and then shoveled or swept into a closed metal container for disposal. All visible spilled material must be removed as outlined above. Reportable quantity 1,000 lbs.

RESTRICTED USE PESTICIDE

Due to Carcinogenicity

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 applicator's certification.

CHROMIC ACID

For manufacturing use only for the production of wood preservative pesticide formulations. For use as a Wood Preservative in Commercial Wood Treating Plants

Active Ingredient:

Chromic Acid (CrO₃).....

Other Ingredients.....

Total

KEEP OUT OF REACH OF CHILDREN

POISON DANGER

Poisonous if swallowed, inhaled or absorbed through skin. Corrosive, causes irreversible eye damage and skin burns. Refer to additional PRECAUTIONARY STATEMENTS.

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 for:

Chemical Specialties, Inc.
200 East Woodlawn Road, Suite 250
Charlotte NC 28217

Email: productinfo@chemspec.com

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

EPA Reg. No. 10465-41
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
SPECIFIC DIRECTIONS FOR USE**

Chromic Acid is a manufacturing use product used to formulate 50% (EPA Reg. No. 10465-26) or 60% (EPA Reg. No. 10465-28) Chromated Copper Arsenate (CCA) wood preservative concentrates. These solutions are to be impregnated into forest products, such as lumber, timber, posts, poles and piles using a vacuum/pressure system.

SPECIFIC USE INSTRUCTIONS

This is a manufacturing use product intended to be mixed by the wood preservative manufacturer with Copper Oxide and Arsenic Acid. The preservative, which is 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 impregnation of forest products utilizing water solutions having concentrations ranging from 0.5% to 10% by weight. Impregnation procedures must tightly adhere to the current Standards of the American Wood-Preservers' Association (AWPA) as they pertain to type of wood product, 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 our health. This product contains Chromium, which has been determined to present a carcinogenic risk to humans. Risks can be reduced by closely following to use directions and precautions, and by properly using the protective equipment listed below.

Applicators must wear protective equipment impervious to the wood treatment formulation in all situations where dermal contact is expected, such as overalls, jacket, hat, gloves, boots, face shield and respiratory equipment. Examples of impervious materials are rubber and PVC. Respiratory protection should be NIOSH approved filter-type used in accordance with the requirements of 29 CFR 1910.134.

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 workboots just be left at the plant and disposed of in a manner approved for pesticide disposal and in accordance with state and federal regulations.

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

Processes used to apply chromium containing wood treatments shall leave no visible surface deposits on the wood, as defined by AWPA Standard C-1. Visible surface deposits means surface residue or crystallization of the wood. Small isolated or infrequent spots chemical residue on otherwise clean wood shall be allowed.

ACCEPTED
with COMMENTS
EPA Letter Dated
NOV 20 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
amended, for the pesticide,
registered under EPA Reg. No. 10465-41