

DEC 14 1990

PM21
62190-2
10x7

Ms. Sheila W. Aguillard
Hickson Corporation
P. O. Box 899
1579 Koppers Road
Conley, GA 30027

BEST AVAILABLE COPY

Dear Ms. Aguillard:

**Subject: Wolmanac Concentrate 50%
CCA Type C Concentrate 50% Wood Preservative
EPA Registration Number 62190-2
Your Submission Dated September 13, 1990**

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Revise the "Precautionary Statements" section to read as follows:

"Danger. May be fatal if swallowed, inhaled or absorbed through the skin. Corrosive. Causes irreversible eye damage and skin burns. Do not get in eyes, on skin or breath dust, vapor or spray mist. Wear goggles and respiratory device approved by NIOSH and OSHA. Wear protective clothing and rubber gloves. Remove contaminated clothing and wash before reuse".

b. Revise the "Statement of Practical Treatment" to read:

If Swallowed, call physician or poison control center. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.
If on Skin, wash with plenty soap and water. Get medical attention.
If Inhaled, remove victim to fresh air. If not breathing, give artificial respiration, preferably

CONCURRENCES

SYMBOL							
DATE							

mouth-to-mouth and get medical attention.
If in Eyes, hold eyelids opened and flush with a steady, gentle stream of water for 15 minutes. Get medical attention."

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

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the label is enclosed for your records.

Sincerely yours,



Susan T. Lewis
Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

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RESTRICTED USE PESTICIDE

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 applicators' certification.

07-3-1

Wolmanac® Concentrate 50%

KEEP OUT OF REACH OF CHILDREN

DANGER POISON



CAUSES SEVERE EYE AND SKIN BURNS
FATAL IF INHALED, ABSORBED
THROUGH SKIN OR SWALLOWED.

Do not get in eyes, on skin, or on clothing.
Wear face shield, plastic gown with long sleeves and plastic gloves when handling.

In case of contact, immediately remove all contaminated clothing, including shoes, and flush skin with plenty of water for at least 15 minutes.

Provide sufficient general/local exhaust ventilation in pattern/volume to control inhalation exposures below current exposure limits.

Thoroughly wash skin thoroughly with soap and water after handling.

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/m³) averaged over an 8 hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

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 cylinders, mixing chemicals, and handling freshly treated wood).

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

Protective clothing* must be changed when it shows signs of contamination. Applicators must leave protective clothing and workshoes or boots and equipment at the plant. Worn out 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.

* Examples of acceptable protective clothing (e.g., gloves, overalls, jackets, boots) required during application and handling of inorganic arsenicals: nyl, polyvinyl chloride (PVC), neoprene, NBR (Buna-N) and polyethylene.

AIR QUALITY MONITORING

Individuals in the work area of an arsenical wood treatment plant 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/m³) averaged over an 8-hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate rivers when disposing of equipment washwaters.

BEST AVAILABLE COPY

WARRANTY We warrant this material to comply with our published specifications and to be of good merchantable quality and such as will regularly pass in the trade for goods within the description, and further warrant it to be fit for the normal purposes for which such goods are used. We assume no responsibility that this material is fit for any particular purpose outside of the general purposes of goods of the description.

For Industrial Use Only

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

Corrosive. Causes irreversible eye damage, skin or mucous membrane irritation. Harmful or fatal if swallowed, inhaled or absorbed through skin. May die in well ventilated area. Do not get on skin, in eyes or on clothing.

INGREDIENTS:

Active Ingredients	
Chromic Acid	23.75%
Arsenic Pentoxide	17.00%
Cupric Oxide	9.25%
Inert Ingredients	
Water	50.00%
Total	100.00%

Arsenic content as metallic is 11.1% As
Chromium content as metallic is 12.35% Cr
EPA Reg No. 62190-2

EPA Est. No. 62190-GA-001

FIRST AID:

EYE CONTACT: Immediately flush with large amounts of water for at least 15 minutes. Immediately seek medical aid.

SKIN CONTACT: Immediately flush area with large amounts of water. Remove contaminated clothing. Immediately seek medical aid.

INHALATION: Remove from exposure. If breathing has stopped or is difficult, administer artificial respiration or oxygen as indicated. Seek medical aid.

INGESTION: Immediately seek medical aid. Do not induce vomiting. Give glass of milk or 1 to 2 oz (30 to 60g) of activated charcoal in water to victim, as tolerated. Do not attempt to give anything by mouth to an unconscious person.

DIRECTIONS:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Contents for use only in pressure-treating wood products. Cannot be used in concentrated form. DO NOT attempt to use without reading the Manual and having the necessary safety equipment. To be used only in vacuum pressure impregnation of wood products utilizing water solutions having concentrations ranging from 1.0 percent to 10.0 percent by weight. Impregnation procedures must rigidly adhere to the current specifications of Hickson Corporation and/or those of the American Wood Preservers Association.

Processer used to apply inorganic arsenical 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 clean wood shall be allowed.)

Pressure treatment of wood products with time-tested Wolman Preservative provides wood in all its forms with "build in" protection against termites, ascomycetes, white rot, brown rot and dry rot.

Refer to label attachment, "Permissible Exposure Limit (PEL) Monitoring Program" for additional information concerning the use of this product.

STORAGE AND DISPOSAL

STORAGE: Keep closures tight and upright to prevent leakage. Keep containers closed when not in use. In case of spillage, absorb and dispose of in accordance with local applicable regulations.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or 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 use other procedures approved by state and local authorities.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. Close container after each use.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DEC 14 1990

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

62,90-2

Sold by Hickson Corporation, Atlanta, GA 30342

MADE IN U.S.A.

HCPL8 R000 9 89

Medical Emergencies 1-800-535-2638 Outside U.S.A. Call 1-404-363-6300

RESTRICTED USE PESTICIDE

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 applicators' certification

P2407

CCA Type C Concentrate 50% Wood Preservative

KEEP OUT OF REACH OF CHILDREN

For Industrial Use Only

DANGER



POISON

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

Corrosive. Causes irreversible eye damage, skin or mucous membrane irritation. Harmful or fatal if swallowed, inhaled or absorbed through skin. Handle in well-ventilated area. Do not get on skin, in eyes or on clothing.

CAUSES SEVERE EYE AND SKIN BURNS.
FATAL IF INHALED, ABSORBED
THROUGH SKIN OR SWALLOWED.

Do not get in eyes, on skin or on clothing.
Wear face shield, plastic gown with long sleeves and plastic gloves when handling.

In case of contact immediately remove all contaminated clothing including shoes and flush skin with plenty of water for at least 15 minutes.

Provide sufficient general/local exhaust ventilation in pattern/volume to control inhalation exposures below current exposure limits.

Promptly wash skin thoroughly with soap and water after handling.

Workers must wear gloves impervious to the wood treatment formulation in 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/m³) averaged over an 8-hour work period. Air monitoring programs, procedures and record retention and submission must be conducted in accordance with the instructions on the attached labeling material.

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

Protective clothing must be changed when it shows signs of contamination. Applicators must leave protective clothing and workshoes or boots and equipment at the plant. Worn out 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.

Examples of acceptable protective clothing (e.g., gloves, overalls, jackets and boots) required during application and handling of inorganic arsenicals: vinyl, polyvinyl chloride (PVC), neoprene, NBR (Buna-N) and polyethylene.

QUALITY MONITORING

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BEST AVAILABLE COPY

WARRANTY We warrant this material to comply with our published specifications and to be of good merchantable quality and such as will regularly pass in the trade for goods within the description and further warrant it to be fit for the normal purposes for which such goods are used. We assume no responsibility that this material is fit for any particular purpose outside of the general purposes of goods of the description.

HCPLB R000-9-89

Medical Emergencies 1-800-535-2638 Outside U.S.A. Call 1-404-363-6300

INGREDIENTS:

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E.P.A. Reg. No. 62190-2

EPA Est. No. 62190-GA-001

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Refer to label attachment, "Permissible Exposure Limit (PEL) Monitoring Program" for additional information concerning the use of this product.

STORAGE AND DISPOSAL

STORAGE: Keep closures tight and upright to prevent leakage. Keep container closed when not in use. In case of spillage, absorb and dispose of in accordance with local applicable regulations.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or 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 a sanitary landfill, or by other procedures approved by state and local authorities.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. Close container after each use.

Sold by Hickson Corporation, Atlanta, GA 30342

MADE IN U.S.A.

EXHIBIT I

Permissible Exposure Limit (PEL) Monitoring Program

Implementation

Each arsenical wood treatment plant employer shall require all employees potentially exposed to airborne inorganic arsenic to wear properly fitting, well-maintained high efficiency filter respirators MSHA/NIOSH-approved for inorganic arsenic for the entire period that the employees are in the treatment application work area or engaged in any activity associated with the treatment process. Alternatively, to potentially relieve employees from the burden of wearing respirators, the employer may implement a Permissible Exposure Limit (PEL) monitoring program. This requirement becomes effective for existing plants on July 10, 1986. Any plants which begin operations in the future will have 3 months from the date of initial operation to implement this requirement.

All wood treatment plant employers who elect to implement the PEL monitoring program must determine the current levels of airborne arsenic, averaged over an 8-hour period, to which their employees are exposed by July 10, 1986. Monitoring data obtained two years prior to this implementation date may be used to determine the initial levels of airborne exposure to employees, if the data were obtained in the same manner as described below in the "Monitoring and Measurements Procedures" unit, and if the employer can certify that no changes have been made since the time of monitoring that could have resulted in new or additional employee exposure to inorganic arsenic including events on the "PEL Checklist" below.

If the initial or subsequent monitoring demonstrates that airborne inorganic arsenic in a work area is greater than 10 ug/m³, all employees working in that area are required to wear properly fitting, well-maintained high efficiency filter respirators MSHA/NIOSH-approved for inorganic arsenic. If in subsequent monitoring, at least two consecutive measurements taken at least 7 days apart, the inorganic arsenic levels are below 10 ug/m³, employees in those areas may discontinue the wearing of the respirators, except as discussed in the "PEL Checklist" below. However, if the employee exposure is above 5 ug/m³ and below 10 ug/m³, the employer shall repeat monitoring at least every 6 months until at least two consecutive measurements, taken at least seven days apart, are below 5 ug/m³. The employer may then discontinue monitoring, except as discussed in the "PEL Checklist" below.

If the monitoring reveals employees are exposed to airborne arsenic levels below 5 ug/m³, monitoring need not be repeated, except as discussed in the "PEL Checklist" below.

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

FIFRA

DEC 14 1990

pesticide
EPA No.

62190-2

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Monitoring and Measurement Procedures

The employer shall collect personal air samples, including at least one sample which is adequate to represent typical conditions for a full work shift (at least 7 hours) for each job classification in each work area. Sampling should be done using a personal sampling pump calibrated at a flow rate of 2 liters per minute. Samples should be collected on 0.8 micrometer pore size membrane filter (37 mm diameter). The method of sampling analysis should have an accuracy of not less than $\pm 25\%$ (with a confidence limit of 95%) for 10 micrograms per cubic meter of air ($10 \mu\text{g}/\text{m}^3$) and $\pm 35\%$ (with a confidence limit of 95%) for concentrations of inorganic arsenic between 5 and $10 \mu\text{g}/\text{m}^3$.

Monitoring may be conducted through a request made to the Occupational Safety and Health Administration (OSHA) for monitoring assistance which may be provided free of charge under the terms of the OSHA consultation program as provided under Section 7(c) (1) of the OSHA Act, or by employees or contractors of the employer's choosing.

The Environmental Protection Agency (EPA) may direct that remonitoring take place at statistically selected establishments to assure that the Checklist is effective in identifying events which increase airborne arsenic. Selected employers will be notified by EPA/State enforcement representatives. The employer will be responsible for obtaining current air monitoring data within the time specified in the remonitoring notification and for submitting these data and reports to the EPA as described below:

Data Submission and Certification

The employer shall establish and maintain accurate records which include responses to the PEL Checklist and all monitoring reports. The annual records or copies thereof shall be submitted to the:

U. S. Environmental Protection Agency
Office of Pesticides and Toxic Substances
Compliance Monitoring Staff (EN-342)
401 M Street, SW
Washington, D. C. 20460

All records submitted will be certified by the employer as accurate and in compliance with all calibration, analytical and sampling requirements outlined in this program. If the employer received assistance from an OSHA 7 (C) (1) consultant, that consultant's report to the employer will be an acceptable record of calibration, analysis, and monitoring requiring no additional certification.

FIFRA

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