



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 23, 2003

Ms. Julia Ownbey
Environmental, Health, and Safety Coordinator
Arch Wood Protection, Inc.
3941 Bonsal Road
Conley, GA 30288

Subject: **Wolmanac® Concentrate 5%**
EPA Registration No. 62190-2
Letter dated April 1, 2003

Dear Ms. Ownbey:

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

Proposed Amendment

- revised label

Label Comments

1. The Keep Out of Reach of Children statement along with the signal word "Danger" the skull and cross bone and the word "Poison" must be placed immediately below the ingredient statement.
2. The Precautionary Statements and subheading must be revised to read as follows:

**Precautionary Statement
Hazards to Humans and Domestic Animals
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 breathe dust, vapor or spray mist. Wear goggles and respiratory devise approved by MSHA and OSHA. Wear protective clothing and rubber gloves. Remove contaminated clothing and wash before use."

Note that the Precautionary Statement must be printed in the same type size, except for the subheading, which should be in large bold type size.

- 3. The subheading "General Precautions and Restrictions" must be placed above the statement to read as follows:

General Precautions and Restrictions

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

- 4. The statement "Do not contaminate water, food or feed by storage or disposal" must be placed immediately following the storage and disposal statement heading.

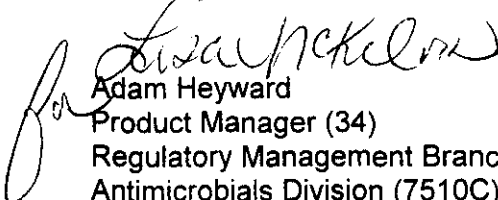
General Comment

Note that First Aid Statement must be revised by October 1, 2003. Refer to PR Notice 2001-1 for detailed information.

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

Wolmanac Concentrate 50%

For Industrial Use Only

KEEP OUT OF REACH OF CHILDREN

Danger  Poison

DANGER. MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN. CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

Do not get in eyes, on skin, or breathe dust, vapor or spray mist. Wear goggles and respiratory devise approved by MSHA and OSHA. Wear protective clothing and rubber gloves. Remove contaminated clothing and wash before use.

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

Promptly wash skin thoroughly after handling.

FIRST AID:

Eye Contact: If in eyes, hold eyelids open and flush with a steady stream of water for 15 minutes. Get Medical attention.

Skin Contact: If on skin, wash with plenty of soap and water. Get medical attention.

Inhalation: If inhaled, remove victim to fresh air. If not breathing, give artificial respiration preferably mouth-to-mouth and get medical attention.

Ingestion: If swallowed, call a physician or poison control center. Drink one or more ounces of water and/or milk as tolerated. Do not induce vomiting. Do not give anything by mouth to an unconscious person.

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

MEDICAL EMERGENCIES: 800-837-0496
Outside USA: 404-616-9000

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. Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE 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 representatives 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.

SPILLS: In case of spillage, treat with 83 pounds (38kg) of lime or 313 pounds (142kg) of cement per 220 POUNDS (100 kg) of spill. Dispose of in accordance with local, state, and federal applicable regulations.

Restricted Use Pesticide

DUE TO ACUTE TOXICITY AND BECAUSE THIS PRODUCT CONTAINS ARSENIC AND/OR CHROMIUM COMPOUNDS SOME TYPES OF WHICH HAVE BEEN ASSOCIATED WITH TUMOR DEVELOPMENT IN HUMANS
For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator certification.

Ingredients

Active Ingredients	
Chromic Acid (CrO3)	23.75%
Cupric Oxide (CuO)	9.25%
Arsenic Pentoxide (As2O5)	17.00%
Inert Ingredients	
Water	50.00%
Total	100.00%

Arsenic content as metallic is 11.1% As.
Chromium content as metallic is 12.35% Cr.

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

E.P.A. Est. 62190-GA-001

E.P.A. Est. 62190-WA-001

E.P.A. Est. 62190-001

DIRECTIONS FOR USE:

Restricted use pesticide

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

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), Sawn 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 uses within the AWWPA Commodity Standards under which the treatment occurred.

Contents for use only in pressure-treating forest 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 pressure impregnation of forest products utilizing water solutions having concentrations ranging from 0.5 percent to 10.0 percent by weight. Impregnation procedures must rigidly adhere to the current specifications by Arch Wood Protection and/or those of the American Wood-Preservers' Association.

Processes used only to apply inorganic arsenical formulations shall leave no visible surface deposits on the wood, as defined by AWWPA 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 forest products with time-tested Wolmanac® Preservative provides wood in all its forms with "built-in" protection against termites, ascomycetes, white rot, brown rot and dry rot.

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 a 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.

APPLICATOR SAFETY

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 (10ug/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 (PEL Monitoring Program).

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 frames 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 work shoes or boots and equipment at the plant. Worn out protective clothing and work shoes 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 are vinyl, 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.

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

Arch Wood Protection, 1955 Lake Park Drive, Ste. 250, Smyrna, GA 30080

ACEAN 24-hr. Emg. Resp. 800-654-6911

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.

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