



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

JUL 21 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Julie Ownby  
Arch Wood Protection, Inc.  
5660 New Northside Drive, Ste 1100  
Atlanta, GA 30328

Subject: Wolfman Concentrate 600%  
EPA Registration Number: 62190-14

Dear Ms. Ownby:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

**Proposed Amendment**

Revise label in accordance with Chromated Arsencials (CCA) RED Labeling Requirements

**Conditions**

Revise the label as follows:

- 1.) Revise the second statement under the "Precautionary Statements" on page 3 to read "Causes irreversible eye damage, *skin burns, and mucous membrane irritation.*"
- 2.) Add the following phrase, "*or using the toilet,*" to the last statement under the "Precautionary Statements" on page 3.
- 3.) The "User Safety Requirements & Recommendations" heading on page 3 must be brought into compliance with PR Notice 2000-5, Mandatory Labeling, by deleting the term, "recommendations." Also, revise the last paragraph in this section by deleting the term, should, and stating "*must.*"
- 4.) Since this product is shipped directly to wood treatment facilities in tank trucks to be loaded into large storage tanks/silos, it is exempt from the Container Rule requirements. Therefore, make the following revisions to the "Storage and Disposal" section on page 4:
  - a.) A product must support only one set of Pesticide Disposal instructions. Therefore, delete the second set of instructions.
  - b.) Delete the phrase, containers less than 5 gallons, under "Pesticide Disposal." Since the product is shipped in tank trucks, it is not applicable.
  - c.) Delete the triple rinse instructions (last 7 statements) under "Pesticide Disposal." The triple rinse statements are associated with the "Container Disposal" section. However, this product is exempt from Container Disposal statements based on how it is transported to the wood treatment facilities.

**General Comments**

A stamped label with conditions is enclosed for your records. Submit a copy of your final printed label before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3 (c) (5) and section 4 (a) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6 (e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@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: A stamped label

3 7 6

Wolmanac Concentrate 60% 62190-14

**RESTRICTED USE PESTICIDE**

DUE TO ACUTE TOXICITY AND BECAUSE THIS PRODUCT CONTAINS ARSENIC AND CHROMIUM compounds which may be associated with tumor development in humans and is considered to have an acute toxicity level. This product is not for retail sale and can only be used by certified applicators holding a current State certification for pesticide applications or are under their direct supervision. It must be used strictly in accordance with this label.

### Wolmanac® Concentrate 60%

(For Pressure Treatment Plant Use Only)

<b>ACTIVE INGREDIENTS:</b>	
Chromic Acid (CrO <sub>3</sub> ).....	28.50%
Cupric Oxide (CuO).....	11.10%
Arsenic Pentoxide. (As <sub>2</sub> O <sub>5</sub> ).....	20.40%
<b>OTHER INGREDIENTS:</b> .....	<b>40.00%</b>
Total	100.00%
Total Arsenic as Metallic.....	13.30 %

**KEEP OUT OF REACH OF CHILDREN**



**DANGER  
POISON**



#### FIRST AID

**IF SWALLOWED:** Call a Poison Control Center or doctor immediately for treatment advice. Have a 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 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.

**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 IN EYES:** Hold eye(s) open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue to rinse eye(s). Call a Poison Control Center or doctor for treatment advice.

Have the product container or label with you when you call a Poison Control Center or doctor, or when going for treatment. For Medical Emergencies: 800-654-6911 (24 hours a day).

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

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

**ESTABLISHMENT NO.:** 62190-GA-01  
 62190-IN-001  
 62190-WA-001

EPA REG. NO. 62190-14

**ACCEPTED**  
 with **COMMENTS**  
 EPA Letter Dated:  
 JUL 2 1 2010

MANUFACTURED BY:

**ARCH WOOD PROTECTION, INC.**  
 5660 New Northside Drive, Suite 1100  
 Atlanta, GA 30328

NET CONTENTS:  
 BATCH CODE: XXXXXX

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

6219074

### DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. 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, dry rot, marine borers (Limnoria and Teredo), and decay. Wolmanac® CCA 60% Concentrate is for the preservative treatment of wood by pressure process according to American Wood-Preservers' Association (AWPA) use category system. Wolmanac CCA 60% Concentrate must be diluted prior to use, between 1 %to 8% active ingredients in treating solution. Dilution rate will vary based on wood species, treatment cycle and final retention. Processes used to apply inorganic arsenical formulations shall leave minimal visible surface deposits on the wood (Visible surface deposits means a surface residue or crystallization on the treated wood. Small isolated or infrequent spots of surface residue on otherwise clean wood shall be allowed.)

#### (For Pressure Treatment Plant Use Only)

**Only the categories of forest products described in the supplemental labeling may be treated with CCA. Forest products treated with this product may only be sold or distributed for uses within those described.**

#### Engineering Controls

The treatment process must include a final vacuum to remove excess preservative from the wood. The final vacuum must attain a vacuum equal to or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.

At the conclusion of the treatment, the cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.

The ventilation process may be accomplished by one of the following methods:

1. activating an air purge system that operates while the cylinder door remains closed; or
2. using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump or auxiliary blower.

If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated. In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation. After ventilation is complete, the cylinder door may be completely opened.

Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative. Personnel must not directly handle the charge cables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves. After treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

As of December 31, 2013, an automatic locking/unlocking device must be used to accomplish locking and unlocking of the cylinder door and mechanical methods must be used to place/remove bridge rails.

#### PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage, skin or mucous membrane irritation. Fatal if swallowed, inhaled, or absorbed through skin. Do not breathe spray mist. Wear eye protection devices and protective clothing and chemical resistant gloves in all situations where dermal contact is expected. 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.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g., cylinders that are not free of the treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

**Personal Protective Equipment (PPE)**

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come in contact with preservative must wear the following PPE:

- washable or disposable coveralls or long-sleeved shirt and long pants,
- chemical resistant gloves, and
- socks plus industrial grade safety work boots with chemical resistant soles.

All personnel rinsing or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:

- washable or disposable coveralls or long-sleeved shirt and long pants,
- chemical resistant gloves,
- socks plus industrial grade safety work boots with chemical resistant soles, and
- a full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel within 15 feet of the cylinder opening prior to ventilation must wear the following PPE:

- washable or disposable coveralls or long-sleeved shirt and long pants
- chemical resistant gloves,
- socks plus industrial grade safety work boots with chemical resistant soles, and
- a properly fitting NIOSH-approved cartridge or canister respirator approved for inorganic arsenic and chromium.

**USER SAFETY REQUIREMENTS ~~RECOMMENDATIONS~~**

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, and smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

Users ~~should~~ wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users ~~should~~ remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users ~~should~~ remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and wildlife. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwaters. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public 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.

**STORAGE AND DISPOSAL**

**STORAGE:** Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

~~**PESTICIDE DISPOSAL:** 1-gallon containers - 5 gallons] 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. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll back and forth, allowing at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.~~

~~**PESTICIDE DISPOSAL:** 1-gallon containers - 5 gallons] 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. Triple rinsing follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Drain rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.~~

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container promptly after emptying. 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.