

75449-1

3-29-2005

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460**

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 29, 2005

Russell J. Morgan
Laboratory Supervisor
ELEMENTIS Chromium LP
3800 Buddy Lawrence Drive
Corpus Christi, TX 78407

Subject: Sodium Bichromate Liquid
EPA Registration Number 75449-1
Application Date: February 2, 2005
EPA Received Date: February 10, 2005

Dear Mr. Morgan:

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

Proposed Amendment:

- Revised labeling

Labeling Comments:

-Add the word **"DANGER"** to the precautionary statement heading.

Other Comments

A stamped copy of the accepted labeling is enclosed. 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)

enclosure: Stamped Labeling

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SODIUM BICHROMATE LIQUID

FOR MANUFACTURING USE ONLY

FOR THE PRODUCTION OF WOOD PRESERVATIVE PESTICIDE FORMULATIONS

Active Ingredient: Sodium dichromate dihydrate *	69.0%
Other Ingredients	31.0%
TOTAL	100.0%

* Na₂Cr₂O₇•2H₂O; CAS No. 7789-12-0

KEEP OUT OF THE REACH OF CHILDREN

DANGER



POISON

Comment: Danger, skull & crossbones and Poison are all in red.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

- MAY CAUSE PERMANENT EYE INJURY AND BLINDNESS.
- MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN.
- CONTACT WITH BROKEN SKIN MAY RESULT IN ULCERS.
- MAY CAUSE KIDNEY AND LIVER DAMAGE IF INHALED, SWALLOWED, OR ABSORBED THROUGH SKIN.
- PROLONGED OR REPEATED BREATHING MAY CAUSE ULCERATION OR PERFORATION OF NASAL MEMBRANES.
- PROLONGED OR FREQUENT REPEATED SKIN CONTACT MAY CAUSE ALLERGIC REACTIONS IN SOME INDIVIDUALS.
- MAY CAUSE CANCER. RISK OF CANCER DEPENDS ON DURATION AND LEVEL OF EXPOSURE.

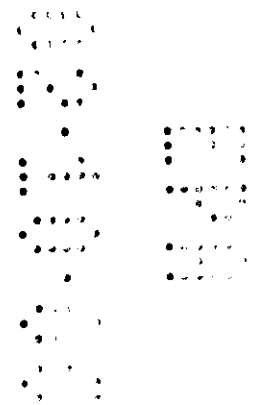
- Do not get in eyes, on skin, or on clothing.
- Do not breath mist or dust.
- When the possibility of exposure exists, wear:
 - MSHA/NIOSH-approved filter respirator for dusts, mists and particulates in accordance with the requirements of 29 CFR 1910.134.
 - Close fitting chemical safety goggles;
 - Chemical resistant gloves such as PVC or nitrile; and
 - Impervious coveralls and footwear or other full body protective clothing.
 - Hard hat
- Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using toilet facilities.
- Remove contaminated clothing and footwear and thoroughly wash before reuse, or discard.

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAR 29 2005

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

75449-1



FIRST AID	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and immediately rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor <u>immediately</u> for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • <u>Immediately</u> take off contaminated clothing. • Rinse skin <u>immediately</u> with plenty of water for 15-20 minutes. • Call a poison control center or doctor <u>immediately</u> for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor <u>immediately</u> for treatment advice. • Do not induce vomiting. • Do not give anything by mouth to an unconscious person. • Give large quantities of water. (If available, give several glasses of milk.)
If inhaled:	<ul style="list-style-type: none"> • 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.
For 24-hour assistance, call Chemtrec at 1-800-424-9300.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN	
Get Input from a Physician Massive overexposure to solutions of this product can lead to kidney failure, liver damage, and death. Death has been avoided in several such cases through the use of early renal dialysis. An effective treatment has been shown to be immediate administration of 5-10 grams ascorbic acid (dissolved in water) by mouth or intravenously followed by 1000 mg three times a day for 14 days. Skin ulcers may be treated by removal from exposure, daily cleansing and debridement, and application of antibiotic creme and dressing to prevent further exposure or contamination.	

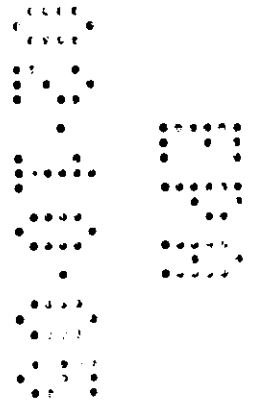
SEE THE BACK PANEL FOR ADDITIONAL INFORMATION.

Made in USA by:
Elementis Chromium LP
3800 Buddy Lawrence Drive
Corpus Christi, TX 78407
361-883-6421

EPA Reg. No. 75449-1
EPA Est. No. 75449-NC-1

HMIS RATING SYSTEM:
Health 3*
Flammability 0
Reactivity 1

NET WEIGHT: 15 Tons 60 Tons



(Back panel)

PHYSICAL & CHEMICAL HAZARDS

OXIDIZING AGENT. Mildly oxidizing in solution but becomes strongly oxidizing in strong acidic solution. Sodium dichromate reacts strongly with materials which are readily oxidized. Combustion can be violent with finely divided oxidizable substances. Oxidizing capability may also sustain a fire involving easily oxidizable material. Thermal decomposition begins at 400°C and may produce oxygen, toxic Na₂O and chromic oxides.

IN CASE OF FIRE: Product is nonflammable. Use media appropriate for surrounding fire. Firefighters should wear NIOSH/MSHA-approved self-contained breathing apparatus in positive pressure mode and bunker gear. Additional protective clothing may be necessary to prevent exposure.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife, fish and other aquatic organisms. 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 Pollution Discharge 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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with labeling. This product is for manufacturing use only for the production of pesticide formulations for use as wood preservatives to control fungi, insects and mites. Local exhaust ventilation with partial enclosure should be employed for processes likely to generate dust, fume or mist/spray. Use precautions to ensure that the environmental controls are adequate to maintain the permissible exposure limits applicable to this product and/or its reaction products. Emergency shower and quick drench eye wash station must be in close proximity to work area.

This product may not be repackaged for sale without the written authorization of Elementis Chromium LP.

Pesticide formulators must obtain their own EPA registrations to legally market their products.

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by the use, storage or disposal of this product.

STORAGE: OXIDIZING AGENT. PROTECT CONTAINERS FROM PHYSICAL DAMAGE AND CONTAMINATION. Store away from heat, ignitions sources, combustible, organic or other readily oxidizable materials, e.g., wood, paper, and greases. Keep container tightly closed when not in use.

PRODUCT AND RINSATE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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. Reclaim if possible. The preferred disposal method is chemical treatment (reduction and neutralization) in accordance with Federal, State and local authorities. Conduct disposal according to 40 CFR Part 261 and 262.

SPILLS:

- CONTAIN SPILL AND CLEAN AREA IMMEDIATELY TO PREVENT DISPERSION OF AIRBORNE MISTS AND DUSTS.
- NEVER FLUSH TO SEWER OR WATERWAYS.
- Isolate hazard area and deny entry to unauthorized and unprotected personnel. Use only qualified, trained responders wearing appropriate personal protective equipment.
- Dike/absorb spilled liquid material with suitable inert sorbent (i.e., sand, soil, vermiculite) and place recovered liquid in a clean closable, labeled container for later recycle or disposal.
- Clean residual spilled product using wet clean-up method (i.e., misting, etc.) or by a vacuum equipped with a High Efficiency Particulate (HEPA) filter.
- Treat spill area "in-situ" with a reducing agent (a solution of sodium bisulfite, sodium sulfite, ferrous sulfate or ferrous chloride) to convert hexavalent chromium to trivalent chromium.
- Adjust the pH of the treated area to neutral with a weak base (sodium bicarbonate, soda ash, or lime).
- Dispose of wastes through an approved Waste Contractor and in accordance with all applicable regulations.
- Report spills as appropriate to Federal, State and local authorities. Reportable quantity is 10 lbs. (40 CFR 117.3). NOTE: Treatment of recovered product, contaminated soil and debris may be considered "hazardous waste treatment" and must only be done with appropriate regulatory agency approval and permits.

CONTAINER: DISPOSAL: Return empty tank cars and tank trucks in compliance with applicable DOT regulations.