



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: Chromic Acid Flake
EPA Registration Number 75449-2
Application Date: February 1, 2005
EPA Received Date: February 9, 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 the following comment:

Proposed Amendment

- Revised labeling

Label Comments

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

A stamped copy of the accepted labeling is enclosed. 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)

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Chromic Acid Flake (EPA Reg. No. 75449-2)
Label Amendment (drums - printed on pressure sensitive label stock)
(tote bins, railcars & tank trucks - printed on both sides of heavy card stock)
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CHROMIC ACID FLAKE

FOR MANUFACTURING USE ONLY

FOR THE PRODUCTION OF WOOD PRESERVATIVE PESTICIDE FORMULATIONS

Active Ingredient: Chromic Acid (CrO ₃ ; CAS No. 1333-82-0)	99.85%
Other Ingredients	0.15%
TOTAL	100.00%

KEEP OUT OF THE REACH OF CHILDREN



DANGER

POISON

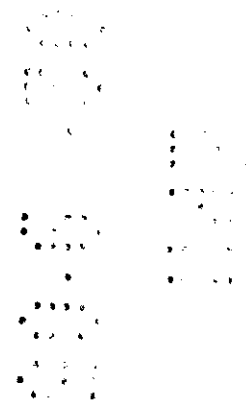
Comment: Will be printed in Red

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Fatal if absorbed through skin. May be fatal if swallowed or inhaled. Corrosive. Causes irreversible eye damage. Causes skin burns. Possible cancer hazard. Do not get in eyes, on skin, or on clothing. Do not breathe dust. Wear goggles, face shield or safety glasses; rubber or PVC gloves; protective clothing (rubber boots and apron, long-sleeve shirt, long pants, hard hat), and a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse.

ACCEPTED
with COMMENTS
- EPA Letter Dated:
MAR 29 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
75449-2



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FIRST AID	
Concentrated Chromic Acid. Corrosive.	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and <u>immediately</u> rinse slowly and gently with water for 15-20minutes. • 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. • Have person sip a glass of water if able to swallow. • Do not induce vomiting. • Do not give anything by mouth to an unconscious person.
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	
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 cream and dressing to prevent further exposure or contamination.	

SEE THE SIDE/BACK PANEL FOR ADDITIONAL INFORMATION.

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

EPA Registration No. 75449-2
EPA Establishment No. 75449-NC-001

- NET WEIGHT: 100 lb. 500 lb. 55 lb. (25 kg) 110 lb. (50 kg)
- 1.5 Tons 50 Tons 75 Tons 85 Tons

4 8 5

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(Side/Back panel)

PHYSICAL & CHEMICAL HAZARDS

THIS PRODUCT IS A STRONG OXIDIZING AGENT, even in solution. Keep away from oxidizable and combustible materials, especially at elevated temperatures. Both the dry form and solutions of this product may react violently with organic materials such as grease and oil, especially in confined spaces. Thermal decomposition may produce toxic oxides of chromium which may be hazardous. **THIS PRODUCT IS A STRONG ACID. Corrosive.**

IN CASE OF FIRE: Under fire conditions, decomposing materials may form a hot viscous foam. Self-contained breathing apparatus should be worn by fire fighters in areas where the product is stored. Product is not combustible. Water fog, dry chemical or carbon dioxide may be used in areas where product is stored.

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. Availability of safety shower and eyewash fountain is recommended. 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.

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STORAGE AND DISPOSAL

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

STORAGE: Do not store in close proximity to combustible materials. Store in tightly closed containers away from sources of heat.

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. The preferred disposal method is chemical treatment (reduction and neutralization) in accordance with Federal, State and local authorities

SPILLS: Follow Precautionary Statements. Stop Leaks. Contain spill by diking. Carefully shovel or sweep spilled dried material. Remove as much material as possible and place in a closed, labeled container for reuse or disposal at an appropriate waste disposal facility. Treat spill area with a reducing agent (e.g. sodium bisulfite, sodium sulfite, ferrous sulfate or ferrous chloride), then neutralize with sodium bicarbonate, soda ash, or lime. Following neutralization, soak up with absorbent material (e.g. sand), place in a closed, labeled container and remove to an approved chemical waste disposal facility. NEVER FLUSH TO SEWER. Report spills as appropriate to Federal State and local authorities. Reportable quantity is 10 lbs. (40 CFR 117.3).

CONTAINER DISPOSAL:

Drums - Triple rinse (or equivalent). Then offer for reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

Bulk Bins, Rail Tank Cars and Tank Trucks – Return Empty in compliance with applicable DOT regulations

HMIS RATING SYSTEM: Health 3* Flammability 0 Reactivity 1