

75449-2

7/24/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 24 2012

Calvin Overcash
Regulatory Manager
Elementis Chromium Inc
5408 Holly Shelter Road
Castle Hayne NC 28429

Subject Chromic Acid Flake
EPA Registration No 75449 2
Notification Date June 25 2012
EPA Receipt Date June 25 2012

Dear Mr Overcash

This letter acknowledges receipt of your notification submitted under the provisions of FIFRA section 3(c)9 and PR Notice 98 10

Proposed Notification
Label revision in response to EPA letter dated September 8 2010

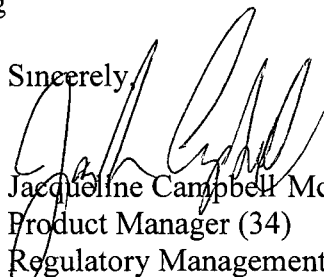
- The revised Storage and Disposal Statement headings
- Correction to the Environmental Hazard section National Pollutant Discharged Elimination Systems (NPDES) page (3)

General Comments

Based on a review of the submitted materials your notification for the revised label in response to the EPA letter dated 9/8/2010 are acceptable and apart of the records on file

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 or Lorena Rivas by telephone at (703) 305 5027 or by e mail at rivas_lorena@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 Campbell McFarlane
Product Manager (34)
Regulatory Management Branch II

Microbiologicals Division (7510P)

CONCURRENCES

SYMBOL	7510P							
SURNAME	A. Rivas							
DATE	7/24/12							



June 25 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
Room S 4900 One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202

Attention Jacqueline Campbell PM 34

Re Chromic Acid Flake
EPA Reg No 75449 2
Revised Labeling Per September 8 2010 EPA Letter

Elementis Chromium Inc is responding to your letter of September 8 2010 (copy enclosed) which requested revisions to the headings in the Storage and Disposal section of the labeling for this product Chromic Acid Flake EPA Reg No 75449 2 In the process of preparing this response we noted that National Pollution Discharge System needs to be corrected to National Pollutant Discharge Elimination System in the Environmental Hazards section of the label

We are hereby requesting that upon your acceptance of the revised labeling enclosed that you provide us with a stamped accepted label that can be posted in PPLS and that we can use for state registration purposes

Contents of Submission

- One copy of the label with changes clearly marked
- One unmarked copy of the label
- One copy of your letter of September 8 2010

Please contact me by phone at (910) 675 7229 or email (Calvin Overcash@elementis.com) should you have any questions or if I can be of assistance

Sincerely

Calvin Overcash
Regulatory Manager
Elementis Chromium

cc Richard L Conn (Consultant to Elementis)

ELEMENTIS CHROMIUM, Inc

5408 Holly Shelter Road
Castle Hayne NC 28429
Telephone 910/675 7200
Facsimile 910/675 7201

Elementis Chromium

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		<u>0 15%</u>
TOTAL		100 00%

KEEP OUT OF THE REACH OF CHILDREN



DANGER

POISON

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

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

FIRST AID Concentrated Chromic Acid Corrosive	
If in eyes	Hold eye open and <u>immediately</u> 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	Take off contaminated clothing Rinse skin <u>immediately</u> with plenty of water for 15 20 minutes Call a poison control center or doctor for treatment advice
If swallowed	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 unless told to 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
For emergency information on chromic acid call the National Pesticides Information Center at 1 800 858-7378 6 30 AM to 4 30 PM Pacific time (PT) seven days a week During other times call the poison control center 1-800 222 1222	
Have the product container or label with you when calling a poison control center or doctor or going for treatment	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage 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 Inc
5408 Holly Shelter Rd
Castle Hayne NC 28429
910 675 7203

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

(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 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 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 Only for formulation as a preservative for the following uses 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

STORAGE AND DISPOSAL

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

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

PESTICIDE 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 HANDLING

Drums – Nonrefillable container Do not reuse or refill this container Offer for reconditioning if appropriate Triple rinse container (or equivalent) promptly after emptying Triple rinse as follows Empty remaining contents into application equipment or a mix tank Fill the container ¼ full with water Replace and tighten closures Tip container on its side and roll it back and forth ensuring 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

Bulk Bins – Refillable container Refill this container with pesticide only Do not reuse this container for any other purpose Cleaning the container before final disposal is the responsibility of the person disposing of the container Cleaning before refilling is the responsibility of the refiller To clean the container before final disposal empty the remaining contents from this container into application equipment or mix tank Fill the container about 10 percent full with water Agitate vigorously or recirculate water with the pump for 2 minutes Pour or pump rinsate into application equipment or rinsate collection system Repeat this rinsing procedure two more times

Rail Tank Cars and Tank Trucks – Refillable Return Empty in compliance with applicable DOT regulations

HMIS RATING SYSTEM Health 3* Flammability 0 Reactivity 1