

Memorandum

Date: March 30, 1981

Subject: EPA REG. NO.: 1015-10 TETRAFUME  
Caswell # 164, 162, 813, 439, 642AA

From: Cheryl A. Peterson *CP*  
IRB/TSS

To: Mr. William Miller  
Product Manager (16)

Registrant: Douglas Chemical Co.  
P.O. Box 297  
Liberty, MO 64068

Active Ingredients:

Carbon Tetrachloride.....	80.9%
Carbon Disulfide.....	16.0%
Ethylene Dibromide.....	1.2%
Sulphur Dioxide.....	1.5%
Pentane.....	0.4%

Inert Ingredients..... 0%

Background:

This product is registered as a grain fumigant for elevators and Boxcars on wheat, corn etc. against weevils. The company has submitted an application for amended pesticide product registration involving a label improvement program. A method of support has not been indicated, and no data have been submitted.

Recommendations:

1. IRB/TSS would have no objection on the basis of acute toxicological considerations to the acceptance of the proposed amendment with the label revisions indicated below.

2. The fourth edition of Clinical Toxicology of Commercial Products states that carbon tetrachloride has a notoriously poor record of safety. There have been numerous instances of carbon tetrachloride poisoning. The latency period for the development of symptomology after inhalation is usually only a few minutes. Taking these factors into account, IRB/TSS recommends that this product be classified in Toxicity Category I based on inhalation toxicity. An acute LC50 inhalation study conducted on this product would aid in further evaluation of the acute toxicity involved.

Labeling:

1. The appropriate signal word is DANGER.
2. The statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." should appear under the heading DIRECTIONS FOR USE which should replace the heading APPLICATION.
3. The heading GENERAL CLASSIFICATION should be deleted.
4. The Precautionary Statements should be similar to the following:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Fatal if swallowed, inhaled or absorbed through the skin. Do not breathe vapors. Avoid contact with skin, eyes and clothing. Wear a full-faced black cannister face mask pesticide respirator approved jointly by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under 30 CFR Part II for protection against organic vapor and acid gases. Use nitrile or polyvinyl acetate gloves. Wash thoroughly after using. Remove contaminated clothing (including shoes) and do not reuse until all fumigant has been removed either by washing or prolonged airing. Do not enter any structure until it has been aired thoroughly (for at least 24 hours) and all fumigant vapor removed. For emergency entry have an approved hose mask or oxygen breathing apparatus available.

This product should be used only by trained personnel thoroughly familiar with all directions and safety precautions provided on this label.

5. IRB/TSS recommends that the following also appear under PRECAUTIONARY STATEMENTS:

Fumigated areas must be placarded on all entrances with signs containing at least the signal word DANGER and the words "Area under fumigation, do not enter until completely aerated.", the date of fumigation, name of the fumigant used, emergency telephone number for contact, and the name and address of the fumigator. Do not remove warning signs until the fumigated area is completely aerated and safe for entry as indicated by a suitable detector.

Always have someone at hand to help in case of accident. Have him equipped with an air-line respirator or full-face mask equipped with an organic vapor and acid gases canister. Have him stand outside where he can see man working inside.

6. The STATEMENT OF PRACTICAL TREATMENT should be similar to the following:

IF SWALLOWED: Call a physician immediately. Drink glass of water and induce vomiting immediately by touching finger to back of throat. Do not give anything by mouth to an unconscious person.

IF INHALED: Get immediate medical attention. If breathing has stopped, commence artificial respiration.

IN CASE OF EYE CONTACT: Flush with plenty of water. Get medical attention.

IN CASE OF SKIN CONTACT: Flush with plenty of water. Remove contaminated clothing. Get medical attention.

7. Under PRECAUTIONARY STATEMENTS there should be a subheading PHYSICAL AND CHEMICAL HAZARDS followed by something similar to the following:

Do not use or store near heat or open flame.

8. The STORAGE AND DISPOSAL statements should be similar to the following:

Store inside in cool dry place. Do not subject to freezing. Avoid contact with flame or hot surfaces.

Do not re-use container for any purpose.

Triple rinse and dispose of container in a sanitary landfill or by other approved State and local rprocedures.

Pesticide or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under the Resource Conservation and Recovery Act.

9. The word DANGER followed by the word POISON and the skull and crossbones should appear on the front panel.

10. Target organisms should be indicated on the label, with examples given of various insects which indicate use of the product.