11/20/2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

NOV 2 0 2003

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Gerald C. McCaslin Douglas Products and Packaging 1550 East Old 210 Highway Liberty, Missouri 64068-9459

Dear Ms. Paulson:

Subject: Sanafoam Vaporooter II, Dichlobenil 50W EPA Registration Number 1015-70 RED for Dichlobenil

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

Please note that the following changes only apply to the Dichlobenil 50W part of the subpack.

1. It is recommended that the complete company address and phone number be added to the label.

2. Add EPA Registration Number and establishment number to dichlobenil package label.

3. Update First Aid Statement to comply with PR Notice 2001-1 as follows:

FIRST AID

IF SWALLOWED:

-Call a poison control center or doctor immediately for treatment advice

-Have 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 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 open and rinse slowly and gently with water for 15-20 minutes

-Remove contact lenses, if present, after the first five minutes, then continue rinsing eye

-Call a poison control center or doctor for treatment advice

IF INHALED:

-Move person to fresh air.

-If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouthto-mouth, if possible

-Call a poison control center or doctor for further treatment advice

4. Place FIRST AID STATEMENTS in a box format. See PR Notice 2001-1.

5. Add the following hotline information under FIRST AID statements

"For additional information in case of emergency call toll free (1-800-XXX-XXXX). Have the product container or label with you when calling a poison control center or doctor for treatment."

6. Remove current Precautionary Statements and change to the following:

"Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing"

7. Add the following Ground Water Advisory:

"This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination."

8. Add a section called Personal Protective Equipment, with the following information:

Mixers, loaders, applicators and other handlers must wear:

-Long sleeved shirt and long pants

-Shoes plus socks

-Chemical resistant gloves made of any waterproof material

-Chemical resistant apron when mixing and loading

9. Add a section called User Safety Requirements, with the following information: "Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washable, use detergent and hot water. Keep and wash PPE separately from other laundry."

10. Add a section called User Safety Recommendations, with the following information: "Users should:

Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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."

11. Change "Storage" to "Pesticide Storage" under STORAGE AND DISPOSAL

12. Change "Disposal" to "Pesticide Disposal" under STORAGE AND DISPOSAL

13. Change "Plastic Bags" to "Container Disposal: Plastic Bag"

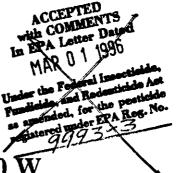
14. Add the following restriction:

"When used in inhabited buildings (residences, offices, hospitals, etc.,)windows must be open or an exhaust fan must be operating during the application"

Submit three (3) copies of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely, James A. Tompkins, haj

James A. Tompkins, haj Product Manager 25 Herbicide Branch Registration Division (7505C)



Center Front Panel-Inner Dichlobenil Label

DICHLOBENIL 50 1

(FOR USE IN SANAFOAM VAPOROOTER II FOAM APPLICATIONS)

ACTIVE INGREDIENT DICHLOBENIL (2,6-dichlorobenzonitrile) INERT INGREDIENTS Total	<pre>% by weight 50.0% 50.0% 100.0%</pre>

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON SIDE PANELS.

Si Usted no entiende la etiqueta, busque a su supervisor para que se la explique a usted en detalle. (If you don't understand the label, find your supervisor to explain it to you in detail).

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This package contains two 15 oz. water soluble inner bags for direct addition to the equipment mix tank when making foam applications of SANAFOAM VAPOROOTER II. See the outer box label for additional precautions, complete labeling, and instructions for use in SANAFOAM VAPOROOTER II.

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			ACCEPTED with COMMENTS in EPA Letter Dated		ε
Net	Contents: DICHLOBENIL 50W POWDER:	NOV 2 0 2003 Under the Federal Insecticide, Fungiside, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.	2 x	15 02.	
		1015-70		(

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Left Front Panel-Inner Dichlobenil Label

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STATEMENT OF PRACTICAL TREATMENT

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- IF INHALED: Remove victim to fresh air. Get medical attention.
- IF ON SKIN: Wash with plenty of soap and water.
- IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Do not induce vomiting or give anything by mouth to an unconscious person.
- IF IN EYES: Flush with plenty of water for at least 15 minutes. Call a physician if irritation persists.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Do not breathe dust. Do not allow contact with eyes or skin. Wear protective clothing and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

Keep all unprotected persons, children, livestock and fets away from treated area or where there is danger of drift, such as a spill.

Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help immediately. See Statement of Practical Treatment.

Right Front Panel-Inner Dichlobenil Label

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Toxic to fish and aquatic life. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Equipment washwaters and wastes resulting from the use of this product may be disposed of on site according to label directions or at an approved waste disposal facility. Do not use in potable sewer systems. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Keep off lawns and plants as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

USE PRECAUTIONS

See the outer box label for additional precautions, complete labeling, and instructions for use in SANAFOAM VAPOROOTER II.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetative matter. Do not store near petfor livestock quarters. Store in a cool, dry, and well ventilated area. Do not open this protective outer tube until water soluble bags are needed.

DISPOSAL: Wastes resulting from the use of this product may be disposed of on site by discharging into sever pipes being treated or at an approved waste disposal facility.

Plastic Bags: Remove both water soluble bags from the duter protective plastic tube before use in application equipment. Then dispose of empty outer tube in a sanitary landfill or by the incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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