

October 28, 1999

Certified Mail (P-060-144-289)

Fuller System, Inc.
226 Washington St.
Woburn, MA 01801

$\frac{360}{18}$ 5-570582

Attention: David Brock

Subject: Fulex Dithio Insecticidal Smoke
EPA Registration No. 1327-38
Your amended application of October 8, 1999
Sulfotepp Reregistration Eligibility Decision Document (September 1999) and
Memorandum of Agreement of September 30, 1999

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling with the following changes before you release the product for shipment:

A. Can Label

1. Make sure no text is less than 6 points.
2. On Front Panel under "DANGER", change referral statement to:

REFER TO SUPPLEMENTAL LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS, INCLUDING EARLY ENTRY PPE STATEMENTS.

3. Under "Restricted Use Pesticide", revise the text to read:

Due to Very High Dermal and Inhalation Toxicity to Humans

B. Supplemental Label

1. On Page 2 under "Use Restrictions" under next to last sentence, add "initial" before "ventilation".
2. On Page 1, in "AGRICULTURAL USE REQUIREMENTS", add the heading "Initial Ventilation Criteria" before 2nd paragraph and add the heading "Secondary Ventilation Criteria" before the 3rd paragraph.

3. In the "Application Directions", Item 1 must be:

All entries to the structure must be posted with the required fumigant warning signs.

Information about blocking entrances would follow Item 12.

4. Modify Item 4 to read:

A certified applicator wearing maximum PPE must perform the remaining tasks.

5. In the section on **Personal Protective Equipment**, before "Applicators and other handlers must wear:...", insert the following:

Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride ≥ 14 mils, and Viton ≥ 14 mils."

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

- Enclosures: 1. Stamped Label
2. A-79 Enclosure

DANGER

PRECAUTIONARY STATEMENTS

Hazards To Humans And Domestic Animals

Refer to Personal Protective Equipment Section of Supplementary Datasheet

PHYSICAL OR CHEMICAL HAZARDS

Do not operate this can near flammable material.

DANGER: Fatal if swallowed, inhaled, or absorbed through the skin or eyes. Do not get in eyes or on skin. Do not breathe fumes. Rapidly absorbed through skin.

User Safety Recommendations

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.

STORAGE AND DISPOSAL

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

STORAGE: Store only in original container, in a dry place inaccessible to children and pets and away from domestic dwellings. Igniters may pick up moisture in a damp place.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes are not disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

RESTRICTED USE PESTICIDE

Due to Very High Acute Inhalation Toxicity to Humans.

For retail sale and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

STOP: BEFORE USING, READ THE PRODUCT LABEL AND SUPPLEMENTAL LABELING FOR FULEX DITHIO INSECTICIDAL SMOKE.

This can not for distribution and resale separately.

Fulex

Dithio Insecticidal Smoke

ORGANOPHOSPHATE

For Commercial/Agricultural Use ON, Y

Net Weight 7oz. Treats 20,000 Cu Ft

Active Ingredients

0,0,0,0-Tetraethyl dithiopyrophosphate 14%

Inert Ingredients 86%

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

STATEMENT OF PRACTICAL TREATMENT

ORGANOPHOSPHATE

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger or if available by administering syrup or ipecac. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Give artificial respiration if needed, preferably mouth-to-mouth. Get medical treatment immediately.

IF ON SKIN: Remove contaminated clothing and wash affected area immediately with soap and water. Call a physician immediately.

IF IN EYES: Immediately flush eyes with plenty of water. Call a physician immediately.

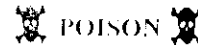
NOTE TO PHYSICIAN

POISONING SYMPTOMS: Symptoms include weakness, headache, tightness in chest, blurred vision, nonreactive pin point pupils, salivation, nausea, vomiting, diarrhea and abdominal cramps.

PHYSICIAN'S TREATMENT: Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, Atropine Sulfate should be injected at 10 minute intervals in doses of 1

to 2 milligrams until complete atropinization has occurred. Morphine is contraindicated. 2 PAM is also antidotal and may be administered in conjunction with Atropine. Clear chest by postural drainage. Repeated exposure to cholinesterase inhibitors may without warning cause prolonged susceptibility to very small doses of any cholinesterase inhibitor. Allow 24 hours exposure until time for cholinesterase regeneration has been allowed as determined by clinical test.

SEE LEFT SIDE PANEL FOR ADDITIONAL PRECAUTIONS with COMMENTS in EPA Letter Dated



POISON

Can contain deadly poisonous material which ignited gives off poisonous smoke and vapors. DO NOT USE UNTIL AFTER READING SUPPLEMENTARY INSTRUCTION SHEET.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Refer to the sheet entitled "Supplemental Labeling for Fulex Dithio Insecticidal Smoke" for complete instructions for worker protection, use directions, and reentry.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

NOTICE TO PURCHASER

Seller's guaranty shall be limited to the terms of the label, and subject thereto the buyer assumes any risk to persons or property arising out of misuse or improper handling and accepts the product on these conditions.

Manufactured by
FULLER SYSTEM, INC
WOBURN, MA 01801 U.S.A.
EPA Registration No. 1127-18
EPA Establishment No. 1127-MA-01

OCT 28 1999

Registered Federal Insecticide,
Fungicide, and Rodenticide Act
Approved for the pesticide
Registration under EPA Reg. No.
1327-38

Isabel

Can
Label
3/5

4/5

SUPPLEMENTAL LABELING FOR FULEX DITHIO INSECTICIDAL SMOKE FUMIGANT
EPA REGISTRATION NO. 1327-38

See Basic Product Labeling for complete information about ingredients, restrictions, precautionary statements, and storage and disposal.

RESTRICTED USE PESTICIDE

Due to Very High Acute Inhalation Toxicity to Humans. For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for uses covered by the Certified Applicator's certification.

ACCEPTED

REVISIONS
EPA Letter Dated:

OCT 28 1999

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear: 1) Long-sleeved shirt and long pants, 2) Chemical-resistant gloves, 3) Shoes plus socks, 4) NIOSH-approved air-supplying respirator that is one of the following types: a) a supplied-air respirator (MSHA/NIOSH approval number prefix TC-19C) or b) a self-contained breathing apparatus (SCBA) (MSHA/NIOSH approval number prefix TC-13F).

1327-38

EXCEPTION: Handlers are permitted to wear a NIOSH-approved organic-vapor-removing respirator (see types below) instead of an air-supplying respirator *provided* they meet one of the following criteria: (1) the handler will ignite five or fewer canisters *and* will be in the greenhouse for less than 10 consecutive minutes starting when the first canister is ignited OR (2) the handler will enter the treated greenhouse to operate ventilation equipment after application is complete (smoke is no longer being generated) but before full ventilation has taken place *and* will remain in the treated house for less than 10 consecutive minutes.

The NIOSH-approved organic-vapor-removing respirator must be equipped with: a) an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or (b) a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or (c) a NIOSH-approved organic vapor cartridge or canister equipped with any N², R, P, or HE prefilter.

The organic-vapor-removing cartridge must be replaced with a new organic-vapor-removing cartridge and a new HEPA prefilter just prior to each use in sulfotepp-treated areas.

In addition, any handler who handles this product in a greenhouse, including a handler who enters the greenhouse before the ventilation criteria have been met to initiate ventilation, must maintain continuous visual or voice contact with another handler. That other handler must have immediate access to the PPE required on this labeling for handlers in the event entry into the fumigated greenhouse becomes necessary for rescue.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling
Notify local Fire Department before fumigating.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Entry (including early entry that would otherwise be permitted under the WPS) by any person -- other than a correctly trained and equipped certified applicator who is performing a handling task permitted by the WPS -- is PROHIBITED in the entire greenhouse (entire enclosed structure/building) from the start of application until the greenhouse is ventilated as follows: 11 hours with no ventilation, followed by (1) 5 air exchanges; (2) 1 hour of mechanical ventilation (fans); or (3) 2 hours of passive (vents) ventilation.

After the initial ventilation criteria have been met, workers are permitted to enter the treated greenhouse to perform tasks, including hard labor tasks, *provided* (1) they work in the sulfotepp-treated area no more than 4 hours in the first 24 hours following application; (2) they work in the sulfotepp-treated area no more than 4 hours in the period 24 hours to 48 hours following application; AND (3) for the first 48-hours following application when any worker is present in the treated greenhouse, the greenhouse is ventilated -- continuously or intermittently -- so that within each hour one of the following ventilation criteria has been met: 2 air exchanges or 5 minutes of mechanical (fans) ventilation, or 10 minutes of passive (vents, windows) ventilation.

Notification: Notify workers of the application by warning them orally and by posting fumigant warning signs at all entrances to the greenhouse. These signs must bear the skull and crossbones symbol and state: (1) "DANGER/PELIGRO", (2) "Greenhouse under fumigation, DO NOT ENTER/ NO ENTRE", (3) the date and time of fumigation, (4) "Fulex Dithio Insecticidal Smoke Fumigant in use" and (5) name, address and telephone number of the applicator. Post the fumigant sign for this application, but follow all WPS requirements pertaining to location, legibility, size and timing of posting and removal.

USE RESTRICTIONS

For use ONLY in greenhouses on these sites: Azaleas, Carnations, Chrysanthemums, Geraniums, Roses, Snapdragons, and poinsettias. For use ONLY against these pests: red spider, thrips, aphids, white flies, mealy bugs, and soft brown scale. Do not use on edible plants.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application

For use in commercial greenhouses only. Use in residential greenhouses or other indoor plant sites is prohibited.

Do not apply this product to a greenhouse that is attached to another structure, including another greenhouse, unless the greenhouse to be treated is entirely sealed off from the other structures.

Do not apply this product in any greenhouse that is located within 100 feet in any direction of a residential area (e.g. homes, schools, apartments, playgrounds, recreation areas).

Entry to a treated structure by a retail customer is prohibited for 48 hours after treatment, or until ventilation criteria have been met.

Use of this product after September 30, 2004 is prohibited.

PREAPPLICATION INSTRUCTIONS

Close all greenhouse vents prior to use. Do not place generators on wood or other flammable materials as fire hazard may result. Turn off misting systems. Keep generators a minimum of 2 feet away from plants. Temperatures in the greenhouse must be between 70 Degrees F to 90 Degrees F (21.1 Degrees C to 32.2 Degrees C). Foliage and blooms should be free of moisture and relative humidity should be low. Soil should be moist but do not water on the day of application. Do not apply on rainy or windy days. Pick open blooms before applications. Calculate volume in cubic feet of greenhouse space to be treated in order to determine amount of product required for application. Use only this amount.

APPLICATION INSTRUCTIONS

The importance of following the instructions below, in the order presented, is critical to the successful use of Fulex Dithio Smoke Fumigant. Follow the instructions below in the order indicated:

1. All entries to the structure must be blocked/barricaded and posted with the required fumigant warning signs.
2. All greenhouse vents must be closed and all circulating fans must be turned off.
3. All misting systems must be turned off.
4. A certified applicator wearing the baseline attire plus chemical-resistant gloves must perform the remaining tasks.
5. Remove the tops of the canisters by unscrewing the cap.
6. An ignitor (sparkler) must be inserted into each canister so that the coated portion is facing downward with the bare wire portion plus a small part of the coated portion remaining exposed.
7. Each canister must be placed in position in the greenhouse.
8. After all canisters are set out, the canister furthest from the exit to the greenhouse must be ignited first.
9. Applicator(s) must wear the appropriate respirator and must be monitored continuously from the start of ignition until the applicator has exited the greenhouse.
10. If the canisters are placed in parallel walks, rather than one central aisle, one applicator must be assigned to light the canisters in each walk, at least one of which shall be a certified pesticide applicator, so that fumigation starts simultaneously and all applicators exit the greenhouse simultaneously.
11. Each applicator lights the ignitor in each canister using a hand-held propane torch or butane lighter (not matches or wicked cigarette lighter) that should remain lit for the entire application.
12. Each applicator continues quickly to the next can until all cans are ignited, then exits the greenhouse immediately.
13. Entry into the greenhouse to re-light ignitors that failed to activate the smoke generator is prohibited (if any smoke generator is activated in the greenhouse) unless the task is performed by a certified applicator wearing the specified personal protective equipment, including an air-supplied respirator or SCBA. The use of an organic-vapor removing respirator is prohibited for this task, regardless of the length of time spent in the treated area.
14. If circulating fans are used, the fans may not be turned on until after the applicator(s) have exited the greenhouse.