

1327-41

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 1, 2003

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S-633585

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

Attention: Mr. David Brock

**Subject: Fulex Nicotine Fumigator**  
**EPA Reg. No. 1327-41**  
**Review of Labeling and Confidential Statements of Formula, and**  
**Importation of End-Use Product**  
**Your submission of April 9, 2003**

**Purpose** The purpose of your submission under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is A) to submit revised labeling according to our April 3, 2003, letter, B) to submit revised Confidential Statements of Formula (CSF) for this product and its source, according to our April 3, 2003, letter; and C) to receive our approval to import this product.

**Review of label** The labeling submitted with the above letter is acceptable, provided that you revise your label according to the comments below and submit one (1) copy of final printed labeling to us before you release product for shipment. A copy of the stamped label is enclosed for your records.

1. Revise your text under "Hazards to Humans and Domestic Animals" is follows:

**Hazards to Humans and Domestic Animals**

Fatal if swallowed, inhaled, or absorbed through the skin. Causes substantial but temporary eye injury. Do not get in eyes, on skin, or on clothing. Do not breathe dust or fumes. Wear protective clothing, protective eyewear, and respiratory protection as listed under the "Personal Protective Equipment" section of the "Supplemental Labeling Fulex Nicotine Fumigator" sheet. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

**Review of label-continued**

2. Considering the high toxicity of the product, you should consider adding one or both of the following toll-free telephone numbers to the "FIRST AID" text:

- 1. 1-800-858-7378 (National Pesticide Information Center)
- 2. 1-800-222-1222 (Poison Control Centers)

There are two placement options for these numbers:

- a. repeat the following text four times: "Call a poison control center, doctor, or 1-800-858-7378/1-800-1222, immediately for treatment advice." or
- b. add it as follows:

**FIRST AID**

Have label with you when obtaining treatment advice.  
Call a poison control center, doctor, or 1-800-858-7378/1-800-1222, immediately."

In the later case, it is not necessary to repeat it again in the text.

**Consequence for non-compliance**

If these conditions are not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

**Existing stocks**

There are no stocks of existing labels.

**CSF**

The Confidential Statements of Formula (CSF) for this product and its technical source (dated April 9, 2003) are acceptable. Copies have been placed in our files for this product. All other versions are obsolete.

**Importation of product**

It is acceptable to import this end-use product into the country.

**Questions** If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



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

**Enclosure** Stamped label

**Copy to** Diane Isbell (7508C)  
Deborah Brown, EPA Region 1

**Letter location** Disk 103:A:\Nicotine\1327-41, revise CSF and label,4-30-2003.wpd, May 1, 2003



**DANGER**



### PRECAUTIONARY STATEMENTS

#### Hazards To Humans And Domestic Animals

Refer to Personal Protective Equipment Section of Supplementary Datasheet  
**DANGER:** Fatal if swallowed, inhaled, or absorbed through the skin or eyes.  
Do not get in eyes or on skin. Do not breath fumes. Rapidly absorbed through skin.

#### Environmental Hazards

This pesticide is toxic to fish and aquatic organisms. Do not contaminate water by cleaning of equipment or disposing of wastes.

#### Physical Or Chemical Hazards

Do not operate this can near flammable or combustible material.

### 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 in a dry, well-ventilated area away from heat and direct sunlight. Do not contaminate water, food or feed by storage, use or disposal of this pesticide.

**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 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.

**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, Oral, Dermal and Eye 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.

*Fuller*  
**NICOTINE**  
**FUMIGATOR**

For use ONLY in greenhouses to control aphids and most thrips. One can (12 ounces) treats 20,000 cu. ft.

Active Ingredient: Nicotine (Alkaloid) ..... 13.4%  
Inert Ingredients: ..... 86.6%



**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.)

Can contains poisonous material which gives off Poisonous smoke and vapors when ignited.

### FIRST AID

Have label with you when obtaining treatment advice

<b>If swallowed</b>	- 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 the poison control center or doctor.
<b>If on skin or clothing</b>	- Take off contaminated clothing. - Rinse skin immediately with plenty of water for about 15-20 minutes. - Call a poison control center or doctor immediately for treatment advice.
<b>If inhaled</b>	- Move person to fresh air. - If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. - Call a poison control center or doctor immediately for treatment advice.
<b>If in eyes</b>	- 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 immediately for treatment advice.

(See Back Panel for additional precautionary statements.)

### 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 Fuller Nicotine Smoke" for complete instructions for worker protection, use 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.

Net Weight 12 Ounces

FULLER SYSTEMS  
WOBURN, MASS.

E.P.A. Reg. No. 1327-41

E.P.A. Reg. No. 1327-41

MAY 1 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registered under EPA Reg. No. 1327-41

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

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**RESTRICTED USE PESTICIDE****Due to Very High Acute Inhalation, Oral, Dermal and Eye 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.

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS & DOMESTIC ANIMALS****Personal Protective Equipment**

**Applicators and other handlers must wear:** 1) Coveralls over long-sleeved shirt and long pants, 2) Waterproof gloves, 3) Chemical-resistant footwear plus socks, 4) Protective eyewear, 5) Chemical resistant headgear for overhead exposure and 6) A respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

**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 Restrictions:** Entry by any person -- other than a correctly trained and equipped handler who is performing a task permitted by the WPS -- is PROHIBITED in the entire greenhouse from the start of application until one of the WPS ventilation criteria has been met. The WPS ventilation criteria can not begin until application is complete. i.e., when smoke is no longer being produced. Refer to WPS ventilation criteria in CFR 40 Part 170.110(c)(3).

**PPE for Entry During the Restricted Entry Interval:** PPE for entry by handlers into smoke-treated greenhouses before WPS ventilation criteria have been met is listed in the "Hazards to Humans and Domestic Animals" section of this labeling.

**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 Nicotine Fumigant in use" and (5) name, address and telephone number of an 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**

Do not fumigate violets.

**PREAPPLICATION INSTRUCTIONS**

Close all greenhouse vents prior to use. Block or barricade entries and post warning signs. 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 to determine amount of product required for application. Use only this amount. Carbon or Fly Ash: The larger size cans may throw particles of carbon into the air nearby under certain conditions. If this becomes objectionable, we suggest placing the cans on their sides before lighting. Face them all in one direction (away from the greenhouse exit) lengthwise in the walk. Insert sparklers in the usual manner by igniting the cans while on their sides. Where the greenhouse being fumigated is large enough to require that generators be placed in more than one walk, it is recommended that one person be assigned to light the generators in each walk starting at the end farthest from the exit, so that the fumigation in each walk may start simultaneously and all persons exit from the house simultaneously.

**APPLICATION DIRECTIONS**

1. Determine the proper number of cans needed.
2. Shake each can.
3. Distribute the cans in the center aisle of an ordinary greenhouse. AWAY FROM FLAMMABLE MATERIALS, in the following manner: one can within 10 feet of the ends of the greenhouse and the remaining cans spaced equidistant throughout the length of the greenhouse. As you space the cans in their proper positions, you should unscrew and remove top covers. After cans have been properly distributed prior to ignition, use a match or a cigarette lighter and light the sparkler at the bottom near the handle end so that it will burn toward the top end of the sparkler. Then, after the sparkler is lit, insert it deep into the contents of the can. The first can ignited should be the farthest one from the exit to the greenhouse. Proceed to the next can, etc. until all cans are ignited; then get out of the greenhouse IMMEDIATELY.



**STEP 1**  
Space cans in greenhouse center walk (or in a walk nearest the center) as shown. Remove tops of cans when placing them in position for lighting.



**STEP 2**  
Starting with the farthest can from exit, light the sparkler as shown. Proceed to the next can. **COMMENTS:** in EPA Letter Dated



**STEP 3**  
Insert lighted sparkler deeply into contents of can. Then proceed to next can; light another sparkler, etc. until all cans are ignited.

**REPEAT APPLICATIONS**

Repeat fumigations in one week if necessary.

MAY 1 2003

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

1327-41

**FULEX NICOTINE FUMIGATOR****SUPPLEMENTARY DATASHEET**