

27 FEB 1989

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Wilbur-Ellis Company  
191 West Shaw Avenue, Suite 107  
Fresno, CA 93704-2876

Gentlemen:

Subject: Response to Mevinphos Registration Standard  
Phosdrin 4 Spray  
EPA Registration No. 2935-167  
Your Letters Dated January 27 and February 2, 1989

90-Day Response

1. Summary Sheet - This is not applicable if you are using a purchased, registered source.
2. Formulator's Exemption - Your source has been cancelled. You need to select another one.
3. Confidential Statement of Formula (CSF)
  - a. Submit a revised CSF. Select a registered source. The one listed is cancelled.
  - b. Include the upper and lower certified limits. You may wish to consult with your supplier.

53967:I:Peacock:CBI-07:KEMCO:02/17/89;03/31/89:CL:VO:SG:CL

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

Revised Labeling

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

1. Format your "Storage and Disposal" statements as follows:

**Storage and Disposal**

Do not . . . or disposal.

Storage: . . . .

Pesticide Disposal: . . . .

Container Disposal: . . . .

Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-97 enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). 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 yours,



William H. Miller  
Product Manager (16)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

Enclosures

**RESTRICTED USE PESTICIDE**  
Due to Very High Acute Toxicity to Humans and  
Residue Effects on Birds, Mammals and Aquatic Species

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification. Direct supervision for this product is defined as the certified applicator being physically present during application, mixing, loading, repair and cleaning of application equipment. Certified applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**Wilbur-Ellis**

# PHOSDRIN® 4 SPRAY

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

2935-167

<b>ACTIVE INGREDIENTS:</b>	
Mevinphos (2-carboethoxy-1-methyl vinyl dimethyl phosphite, alpha isomer).....	36.0%*
Related Compounds.....	39.0%*
<b>INERT INGREDIENTS.....</b>	<b>54.0%</b>
*Equivalent to 50.0% W. Mevinphos Insecticide.	Total 100.0%
EPA Reg. No. 2935-167-ZA	EPA Est. No. 33891-AZ-1

**KEEP OUT OF REACH OF CHILDREN!**

**DANGER  
PELIGRO**



**POISON**

**PRECAUCION AL USUARIO:** Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicada ampliamente.

**STATEMENT OF PRACTICAL TREATMENT**

If swallowed and victim is conscious and not convulsing: Call a physician immediately. Give a glass or two of water and induce vomiting by touching back of throat with finger. It is preferable to induce vomiting under medical supervision or to use gastric lavage with a cuffed endotracheal tube because of aspiration hazard. Remove victim immediately to emergency treatment facilities.

If on skin: Immediately remove patient from the vicinity of the insecticide, remove all contaminated clothing and wash skin with soap and running water. Get medical attention.

If in eyes: Flush the eyes with clean water for 30 minutes. Get medical attention.

If inhaled: Remove victim to fresh air. Transport immediately to emergency treatment facility.

(See additional caution and antidote on side panel)

**Wilbur-Ellis**

P.O. BOX 16458 • FRESNO, CA 93755

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Poisonous if Swallowed, Inhaled or Absorbed Through Skin. Rapidly Absorbed Through Skin or Eyes. Repeated Inhalation or Skin Contact May, Without Symptoms, Progressively Increase Susceptibility to Phosdrin Insecticide Poisoning.

Do not swallow or get in or on, on skin or on clothing. Do not breathe vapors. Wear heavy duty natural rubber gloves and waterproof protective clothing and goggles. Replace gloves frequently and destroy used gloves. Wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute of Occupational Safety and Health under the provisions of 30 CFA Part E. Wash thoroughly with soap and water after handling and before eating or smoking. If the material gets into eyes, immediately flush with water for at least ten minutes and get medical attention. In case of contact, remove all contaminated clothing and wash skin with soap and water; wash clothing before re-use. In case of spillage, wash down with large amounts of water. Decontaminate areas and equipment by washing with strong lye solution, then destroy containers to prevent re-use.

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and wildlife. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment wash waters.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

**STORAGE AND DISPOSAL**

- 1. Prohibitions:** Do not contaminate water, food or feed by storage or disposal.
- 2. Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
- 3. 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.
- 4. General:** Store in original container only and keep sealed. Store in closed storage areas. Use caution when moving, opening, closing or pouring. Do not store with food or feed. Keep away from heat or open flame.

**WORK SAFETY RULES**

USE ONLY WHEN WEARING THE FOLLOWING PERSONAL PROTECTIVE EQUIPMENT DURING MIXING/LOADING, APPLICATION, REPAIR AND CLEANING OF MIXING, LOADING, AND APPLICATION EQUIPMENT, AND DISPOSAL OF THE PESTICIDE: protective suit of one or two pieces that covers all parts of the body except head, hands, and feet; chemical-resistant gloves; chemical-resistant shoes (or chemical-resistant shoe coverings or chemical-resistant boots); goggles or face shield; hood or wide brimmed hat; NIOSH or MSHA approved respiratory protection device.

IF MIXING/LOADING IS PERFORMED USING A CLOSED SYSTEM, THE FOLLOWING PROTECTIVE CLOTHING AND EQUIPMENT MAY BE WORN AS AN ALTERNATIVE: Long-sleeve shirt and long-legged pants; chemical-resistant gloves; chemical-resistant apron; shoes and socks. Goggles or face shield must be worn when the system is under pressure. All other protective clothing and equipment required for use with open systems must be available nearby.

IF APPLICATION IS PERFORMED USING AN ENCLOSED CAB OR COCKPIT, THE FOLLOWING PROTECTIVE CLOTHING AND EQUIPMENT MAY BE WORN AS AN ALTERNATIVE: Long-sleeve shirt and long-legged pants; shoes and socks. Chemical-resistant gloves must be available in the cab or cockpit and must be worn during entry to and exit from the application vehicle. All other protective clothing and equipment required for use during application must be available in the cab and must be worn when exiting the cab into treated area. When used for this purpose, contaminated clothing may not be brought back into the cab unless in an enclosure such as a plastic bag. REMEMBER — THIS CLOTHING IS INADEQUATE TO PROTECT YOU DURING REPAIR AND CLEANING OF APPLICATION EQUIPMENT AND EARLY REENTRY TO TREATED AREAS! REFER TO PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS ABOVE.

IMPORTANT! If pesticide comes in contact with skin, wash off with soap and water and contact a physician immediately. Always wash hands, face, and feet with soap and water before smoking, eating, drinking, or talking.

AFTER WORK: Before removing gloves, wash them with soap and water. Take off all work clothes and shoes. Shower using soap and water. Wear only clean clothes when leaving job — do not wear contaminated clothing. Personal or protective clothing worn during work must be stored and laundered separately from household articles. Clean or launder protective clothing after each use. Respirators must be cleaned and filters replaced according to instructions included with the respirator. Protective clothing and protective equipment that becomes heavily contaminated or drenched with mevinphos must be decontaminated according to State and local regulations. HEAVILY CONTAMINATED OR DRENCHED CLOTHING CANNOT BE ADEQUATELY DECONTAMINATED.

The National Pesticide Telecommunication Network is available for recommendation regarding poisoning management, emergency treatment, and other information regarding the toxicity of mevinphos. The toll free number for the National Pesticide Telecommunication Network is 1-800-858-7378.

**DIRECTIONS FOR USE**

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**RE-ENTRY STATEMENT**

Reentry into treated citrus groves, grape vineyards, and nut and peach orchards is prohibited for 96 hours (4 days) after the end of application, unless the protective clothing specified on this label for early reentry is worn. Reentry into all other treated areas is prohibited for 48 hours (2 days) after the end of application, unless the protective clothing specified on this label for early reentry is worn.

**FOR EARLY REENTRY INTO TREATED AREAS BEFORE SPRAYS HAVE DRIED,** wear all protective clothing specified on this label for an applicator.

**FOR EARLY REENTRY INTO TREATED AREAS AFTER SPRAYS HAVE DRIED,** wear protective suit of one or two pieces covering all parts of the body except head, hands, and feet; chemical-resistant gloves; chemical-resistant shoes (or chemical-resistant shoe coverings or chemical-resistant boots).

Written or oral warnings must be given to workers who are expected to be in treated areas or in an area about to be treated with this product. (Indicate specific oral warnings which inform workers of areas or fields that may not be entered without specific protective clothing, period of time field must be vacated and appropriate actions to take in case of accidental exposure.) When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: **DANGER:** Area treated with MEVINPHOS on (date of application). Do not enter without appropriate protective clothing until (insert date/time reflecting end of reentry interval set forth on this label). In case of accidental exposure see STATEMENTS OF PRACTICAL TREATMENT found on the MEVINPHOS product label.

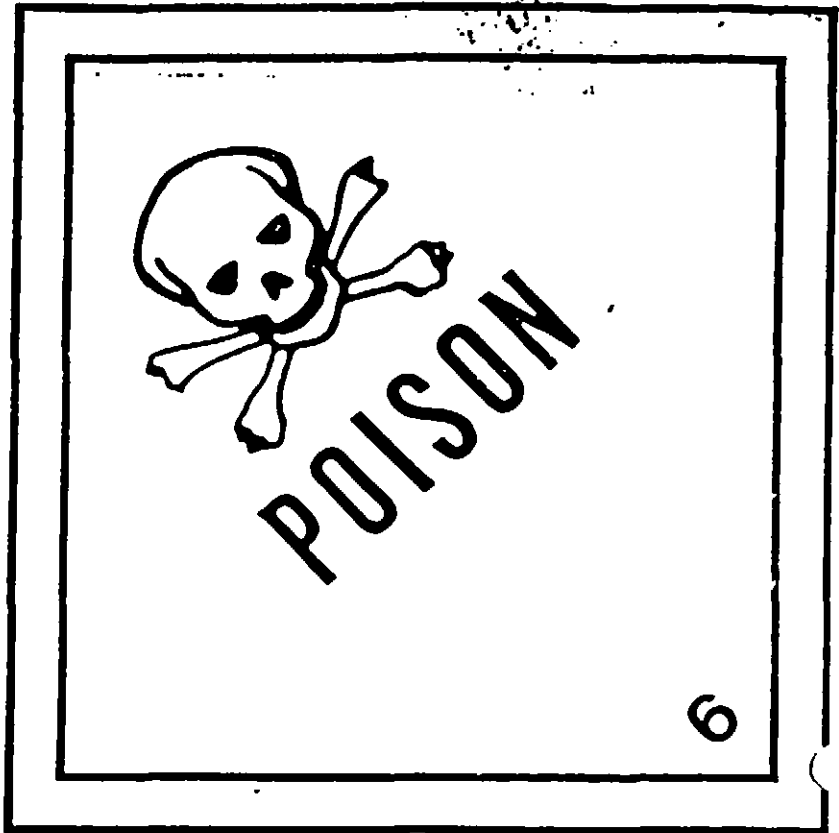
**NOT FOR USE OR STORAGE IN OR AROUND THE HOME.**

Do not apply this product through any type of irrigation system.

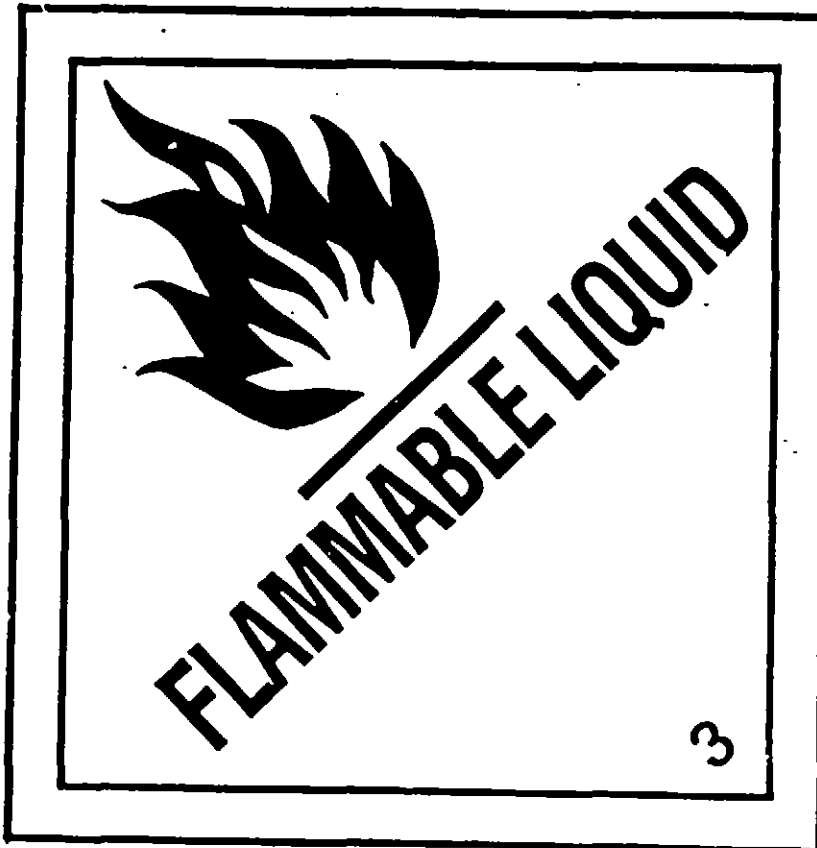
**HUMAN FLAGGERS ARE PROHIBITED** during aerial application of this product unless in totally enclosed vehicles.

**NOTICE:** The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILBUR ELLIS COMPANY does not make, nor does it authorize any agent or representative to make, any warranty, guaranty or representation, expressed or implied, concerning this material or the use thereof, except in conformity with the statements on the label. Neither WILBUR ELLIS COMPANY nor the seller shall be held responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on those conditions.

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**RQ, MEVINPHOS MIXTURE, LIQUID  
NA 2783**



**IN CASE OF EMERGENCY,  
CALL CHEMTREC: (800) 424-9300**