

SPECIAL LABELING REQUIRED FOR BAGS CONTAINING WATER SOLUBLE PACKETS

301-8712.YLD

U.S. LABEL

Base Pre-Reg (8712)

Reason to Issue: To revise PPE to bring into line with generic azinphos labels.

Date of Pre-Draft: 02/05/96 (C)

Guthion Solupak

Guthion® Solupak

50% WETTABLE POWDER CROP INSECTICIDE IN WATER SOLUBLE PACKETS

For effective economical insect control.

ACTIVE INGREDIENT:

O,O-Dimethyl S-[(4-oxo-1,2,3-benzotriazin-3(4H)-yl)methyl] phosphorodithioate 50%

INERT INGREDIENTS: 50%

100%

Keep water soluble packets in this container and store in a cool dry place, but not below freezing (32°F). Protect from heat. Keep away from open flame. Do not heat. Entire inner packets dissolve in water. After opening outer bag, drop the required unopened inner packets into spray tank as directed. Do not excessively handle water soluble packet or expose it to moisture, since this may cause breakage.

DEALERS SHOULD SELL IN ORIGINAL PACKETS ONLY
CONTAINS 5 ONE-POUND WATER SOLUBLE PACKETS

EPA Reg. No. 3125-301

TOTAL NET CONTENTS: 5 Pounds

STOP - Read The Label Before Use
KEEP OUT OF REACH OF CHILDREN

DANGER



PELIGRO

POISON

ACCEPTED
APR 15 1996
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 3125-301

AMENDMENT To Previously Registered Labeling

Personal Protective Equipment
Applicators and other handlers (other than mixers and loaders) must wear:

- ~~Chemical-resistant protective suit~~ Coveralls over short-sleeved shirt and short pants
- Water-proof gloves
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure

- ~~For exposures in enclosed areas, a respirator with either an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH) approval number prefix TC-23G), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)~~
- ~~For exposures outdoors, Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)~~

Text being added is highlighted by redlining

Text being deleted is highlighted by strikethrough

Mixers and loaders must wear:

- ~~Chemical-resistant protective suit~~ **Coveralls over short-sleeved shirt and short pants**
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear
- ~~Chemical-resistant apron when mixing or loading~~
- For exposures in enclosed areas, 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)
- For exposures outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering controls statements: Human flaggers must be in enclosed cabs.

- When handlers use enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS. ~~Water-soluble packets, when used correctly, qualify as a closed loading system under the WPS.~~
- The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations:

User 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.

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) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI).

Each 48-hour REI is increased to 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- ~~Chemical-resistant protective suit~~ **Coveralls over short-sleeved shirt and short pants**
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure

GUTHION Solupak 50% Wettable Powder Insecticide
EPA Reg. No. 3125-301
AMENDMENT - 02/14/96

Section II - Amendment Information

BAYER Corporation is requesting the amendment of our currently registered product GUTHION Solupak 50% Wettable Powder Insecticide, EPA Reg. No. 3125-301. Our amendment concerns the Personal Protective Equipment (PPE) as required under the Worker Protection Standard. Please note, we are submitting a similar accompanying amendment for GUTHION 50% Wettable Powder, EPA Reg. No. 3125-193.

We are proposing these changes for two reasons: 1) to make the Solupak (Reg. No. 3125-301) and the Wettable Powder (Reg. No. 3125-193) labels agree with respect to the PPE requirements, and 2) to make our products' requirements for PPE agree with other "generic" azinphos-methyl products' PPE requirements. The changes we are proposing concern the chemical-resistant protective suit, the respirator requirements and the closed systems requirement.

Chemical-resistant protective suit: One of the specific changes is the replacing of the currently required chemical-resistant protective suit with coveralls over short-sleeved shirt and short pants. We have also included a chemical-resistant apron when mixing or loading for the "Mixers and Loaders" category.

In explanation, BAYER Corporation's GUTHION wettable powder products (active ingredient azinphos-methyl) require a CHEMICAL-RESISTANT PROTECTIVE SUIT. **HOWEVER,** other azinphos-methyl wettable powder products currently on the market only require COVERALLS OVER SHORT-SLEEVED SHIRT AND SHORT PANTS. We have included an example of one such product's label (MICRO FLO'S *Azinpho methyl 50W*, EPA Reg. No. 51036-164, copy enclosed). Both of these products contain 50% azinphos-methyl as the active ingredient but there is wide variation in the PPE required.

We request to be allowed to change our PPE to agree with the PPE currently on the other azinphos labels in the field. Without this language, we are at a disadvantage with our GUTHION products.

Respirator: A second change to our label is the replacement of the requirement for an organic-cartridge respirator with the requirement for the dust/mist filtering respirator for applicators and other handlers.

In explanation, the labeling of our WETTABLE POWDER product (Reg. No. 3125-193) for the "Applicators and other handlers" category only requires the dust/mist filtering respirator. Likewise, the same respirator requirement should be made for the "Applicators and other handlers" category for the SOLUPAK product since the two products are the same formulation.

This is also in accordance with PR Notice 94-8, which allows the addition of WSP to existing registrations via notification. It is understood that, with this notification, the labeling requirements, **including the PPE**, must be the same for the *water-soluble packing* product and the *non-water-soluble packaging* product.

Therefore, the respirator requirements for the GUTHION 50% Wettable Powder (EPA Reg. No. 3125-193) and the GUTHION Solupak 50% (EPA Reg. No. 3125-301) products must agree.

Closed Systems: We have added the following statement under the "Engineering controls statement": **Water-soluble packets, when used correctly, qualify as a closed loading system under the WPS.**

All of our proposed revisions to the PPE are indicated below. (Text that is being added is highlighted by redlining and text that is being deleted is highlighted by **strikeout**.)

Personal Protective Equipment:

Applicators and other handlers (other than mixers and loaders) must wear:

- ~~Chemical-resistant protective suit~~ Coveralls over short-sleeved shirt and short pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure
- For exposures in enclosed area, 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)
- For exposures outdoors, Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

Mixers and loaders must wear:

- ~~Chemical-resistant protective suit~~ Coveralls over short-sleeved shirt and short pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear
- **Chemical-resistant apron when mixing or loading**
- For exposures in enclosed areas, 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)
- For exposures outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering controls statements: Human flaggers must be in enclosed cabs.

- When handlers use closed systems, enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS. Water-soluble packets, when used correctly, qualify as a closed loading system under the WPS.
- The enclosed cabs must be used in a manner that meets the requirements listed in Worker Protection Standard (WPS) for agricultural pesticides [40 CFS 170.240(d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

AGRICULTURE USE REQUIREMENTS

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). Each 48 hour REI is increased to 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protections Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- ~~Chemical-resistant protective suit~~ Coveralls over short-sleeved shirt and short pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure

Five copies of the proposed label for GUTHION Solupak 50% Wettable Powder, dated 02/05/96, are attached.

If you have any questions concerning this amendment, please contact Ms. Karen Cain (816/242-2838).

WPS-12-1996-02-05-01

1

2

3

4

5

6

7

8

9

10

11

12