



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

May 16, 1994

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CERTIFIED MAIL (222333)

Amvac Chemical Corp.
4100 E. Washington Blvd.
Los Angeles, CA 90023

Attention: Ms. Jeannie Smith

Subject: Phosdrin IPA 4
EPA Reg. No. 5481-114
Phosdrin 4 EC
EPA Reg. No. 5481-412
Your applications of December 2, 1993

We have completed our review of the above applications to consolidate labeling changes needed to delete unsupported uses for reregistration, to comply with Worker Protection Standard (WPS) requirements, and to effect other changes.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes to both products, as previously indicated in our January 31, 1994, letter for Phosdrin IPA 4, EPA Reg. No. 5481-114:

1. Wherever it appears on your labeling (for example, in the "PRECAUTIONARY STATEMENTS" and "AGRICULTURAL USE REQUIREMENTS"), change "Chemical-resistant protective suit" to "Coverall over long shirt and long pants.
2. Under the Personal Protective Equipment (PPE) requirements in the "Agricultural Use Requirements", add "Chemical-resistant headgear for overhead exposure." as shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.



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at least 75% recycled fiber

RESTRICTED USE PESTICIDE

Due to Very High Acute Toxicity to Humans and Residue effects on Avian, Mammalian 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 Applicators 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.

Phosdrin[®] IPA 4

ORGANOPHOSPHATE INSECTICIDE

ACTIVE INGREDIENTS:

| | |
|---|---------|
| Mevinphos (2-Carbomethoxy-1-methylvinyl dimethyl phosphate, alpha isomer) | : 31.5% |
| Mevinphos (2-Carbomethoxy-1-methylvinyl dimethyl phosphate, beta isomer) | : 12.5% |

| | |
|-------------------|----------|
| INERT INGREDIENTS | : 56.0% |
| Total | : 100.0% |

NOTE: The decrease in the percentages (from 50.0% to 44.0%) and in the pounds per gallon (from 4 lbs to 3.5 lbs) of total active ingredients does not represent a reduction in strength but in the redesignation of the manufacturing impurities from "active" to "inert". Application rates in pints per acre in the use directions remain the same. Use of product at higher rates is a misuse and could result in illegal crop residues and the need to destroy those crops.

Phosdrin[®] IPA 4, M. Anvar Chemical Corporation. Contains 3.5 lbs Mevinphos per Gallon.

COMMENTS
EPA Letter Dated

KEEP OUT OF REACH OF CHILDREN

DANGER - POISON

PELIGRO

MAY 16 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act

5481-114

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

(If you do not understand this label, find someone to explain it to you in detail)

(Draft Label 114 CROP PM14 09-13-93, p1)

EPA Reg. No. 5481-114

BEST AVAILABLE COPY

STATEMENTS OF PRACTICAL TREATMENT

Atropine is an Antidote. Call a physician in all cases of suspected poisoning. **IF SWALLOWED:** Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching back of throat with finger. Never induce vomiting or give anything by mouth to an unconscious or convulsing person. **IF INHALED:** Remove victim to fresh air immediately. Apply artificial respiration if indicated. Get medical attention. **IF IN EYES:** Flush eyes with plenty of water for 10 minutes. Get medical attention immediately. **IF ON SKIN:** Remove contaminated clothing and immediately wash affected area with soap and water. Call a physician immediately. Wash clothing before reuse.

IF POISONING SYMPTOMS APPEAR: (See POISONING SYMPTOMS under NOTE TO PHYSICIAN). Keep patient prone and quiet. Start artificial respiration immediately if patient is not breathing. Transport the patient immediately to the nearest hospital. SEE ANTIDOTE AND OTHER PRECAUTIONS ON SIDE PANEL.

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER: Poisonous if swallowed, inhaled or absorbed through the skin. Rapidly absorbed through the skin. Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to MEVINPHOS insecticide poisoning. Do not swallow or get in eyes, on skin or on clothing. Do not breathe vapors. Do not contaminate food or feed products.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options follow the instructions of category "C" on an EPA chemical resistance category selection chart.

Applicators and other Handlers must wear; Chemical-resistant protective suit. Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile, Neoprene Rubber, Polyvinyl Chloride or Viton. Chemical-resistant footwear plus socks. Protective eyewear. Chemical-resistant headgear for overhead exposure. A respirator with either an organic vapor removing (O/V) 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). 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 washable, use detergent and hot water. Keep and wash PPE separately from other laundry. (Continued on Left Panel).

EPA REG. NO. 5481-114

EPA EST. NO. 5481-CA-1

NET CONTENT 5 GALLONS

AMVAC CHEMICAL CORPORATION, 4100 East Washington Blvd, Los Angeles, CA 90023

(Draft Label 114 CROP PM14 09-13-93. p2)

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Engineering Controls Statement

Human Flaggers must be in enclosed cabs. The enclosed cabs must be used in a manner that meets the requirements 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. 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.

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.

The National Pesticide Telecommunication Network is available for recommendations 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.

IF PRODUCT IS HANDLED INDOORS provide mechanical exhaust ventilation. Keep all unprotected persons, children, livestock and pets away from treated areas or where there is danger of drift. Do not rub eyes or mouth with hands. If you feel sick in any way, STOP WORK and get help right away, see the first aid Statements of Practical Treatment section on this label.

NOTE TO PHYSICIAN - POISONING SYMPTOMS

Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pin point pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps. **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. Pralidoxime chloride (2-PAM chloride) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion, in 250 cc of saline over a 15 to 20 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5% solution in water over not less than two minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children, the dose of 2-PAM is 0.25 grams. Morphine is an improper treatment.

Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may without warning cause prolonged susceptibility to very small doses of any cholinesterase inhibitor. Allow no further exposure until time for cholinesterase regeneration has been attained as determined by a blood test.

For 24 hours Emergency Medical Assistance call 1-800-228-5635, extension #169.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. For terrestrial use 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. 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.

PHYSICAL and CHEMICAL HAZARDS

Flammable: Keep away from heat and open flame. Not for use or storage in or around the home.
(Continued on Right Panel).

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product through any type of irrigation system. 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 any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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 intervals. 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). The restricted-entry interval for LEMON ORCHARDS and GRAPE VINEYARDS is 4 days. The restricted-entry interval for all other areas is 72 hours.

Personal Protective Equipment (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; Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride or Viton; Chemical-resistant footwear plus socks; Protective eyewear.

Notify the workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

STORAGE AND DISPOSAL

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

STORAGE: Store product in original container in a cool, dry, locked place out of reach of children. Product is flammable. Keep away from heat and open flame. If spilled, avoid exposure. If significant spill, call CHEMTREC (800) 424-9300 or (213) 264-3910. Spill can be contained by covering with a sufficient amount of absorbent material such as clay, diatomaceous earth, sand, sawdust or sweeping compound. Place in drum, label contents & dispose of according to the instructions below in pesticide disposal. **CAUTION:** Wear a pesticide respirator and avoid forming dust clouds during clean-up.

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 the label instructions, contact your nearest State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA regional office for guidance.

CONTAINER DISPOSAL: (Metal) 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. (Plastic) Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incineration, or, if allowed by State and local authorities,, by burning. If burned, stay out of smoke.

For complete Directions For Use on approved crops read and follow the Supplemental Label or Booklet either attached to, or available with this product container.

ORGANOPHOSPHORUS PESTICIDE, LIQUID, N.O.S. 44% MEVINPHOS IN ISOPROPANOL,

FLAMMABLE LIQUID; poison; UN 2784; RQ-1/0.454

Phosdrin[®] IPA 4

Supplemental/Booklet

Labeling for Use on Crops

EPA REG. NO. 5481-114

EPA Est. No. 5481-CA-1

See Label Affixed to the Product for Complete Active Ingredient Statement, Precautionary Labeling, Worker Protection Standards and Restricted-entry Intervals (REI).

GENERAL INSTRUCTIONS

SCOUTING

To maximize Integrated Pest Management (IPM) programs, always monitor insect populations to determine if there is a need for the application of Phosdrin.

SPRAY PREPARATION

To prepare for spraying, add approximately one half the required volume of water to the mix tank. Add the required amount of insecticide and mix thoroughly by mechanical and/or hydraulic agitation. Add balance of water to obtain the desired spray volume and thoroughly mix. Do not store the spray mixture before use.

COMPATIBILITY

Phosdrin, when diluted with the recommended amount of water, is physically compatible with a wide range of commonly used spray products, although the full range of compatibilities under local conditions is not known. In addition, since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures. Do not use Phosdrin with Bordeaux mixture, "Duter" (triphenyltin hydroxide), lime sulfur, Rayplex iron or other highly alkaline materials. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

APPLICATION EQUIPMENT

Do not apply this product through any type of irrigation system. PHOSDRIN IPA 4 can be applied using conventional hydraulic sprayers, low volume ground applicators or aerial sprayers. Do not apply with hand equipment. Use this product only for recommended purposes and at the recommended dosages.

APPLICATION TIMING

Begin application when insect populations reach recognized economic threshold levels. Consult the Cooperative Extension Service, a professional consultant or other qualified authority to determine appropriate economic threshold levels for treatment in your area.

SELECTION OF APPLICATION RATES

Apply the ½ to 1 pint per acre rate to control light infestations. Apply the 1 to 2 pint per acre rate (on applicable crops) to control heavier infestations and insects that are hard to kill.

SUGGESTED WATER RATES TO USE FOR AIRCRAFT AND GROUND APPLICATION

Apply Phosdrin in a suitable volume of water to obtain uniform coverage of foliage. The necessary volume varies with plant growth stage. Mix the recommended amount of Phosdrin in the following volumes of water. To provide thorough coverage of mature plants with heavier foliage, always use the highest recommended application volume.

| <u>CROP</u> | <u>APPLIED BY AIR</u> | <u>APPLIED BY GROUND</u> |
|----------------------------------|-----------------------------------|------------------------------------|
| <u>Vegetable and Field Crops</u> | <u>3 - 20 Gallons Water/Acre</u> | <u>20 - 200 Gallons Water/Acre</u> |
| <u>Grapes</u> | <u>10 - 25 Gallons Water/Acre</u> | |
| <u>Orchard Crops</u> | <u>10 - 25 Gallons Water/Acre</u> | |

USE DIRECTIONS

KEEP A MINIMUM OF A 7 DAY INTERVAL BETWEEN APPLICATIONS.

Read the directions carefully and follow them at all times.

ORCHARD CROPS

IMPORTANT : OBSERVE RESTRICTED-ENTRY INTERVALS (REI) AND WORKER PROTECTION STANDARD STATEMENTS ON LABEL AFFIXED TO PRODUCT CONTAINER.

LEMONS: (Aerial Application Only - Ground Application is Prohibited). For use in California and Arizona only. For control of Aphids and Thrips apply 2 pints per acre. Do not treat within 4 days of harvest. (REI = 4 days).

SMALL FRUITS AND BERRIES

IMPORTANT : OBSERVE RESTRICTED-ENTRY INTERVALS (REI) AND WORKER PROTECTION STANDARD STATEMENTS ON LABEL AFFIXED TO PRODUCT CONTAINER.

GRAPES: (Aerial Application Only - Ground Application is Prohibited) For control of Aphids, Leafhoppers, Lygus Bugs, Mites and Red-Banded Leafrollers, use 1 to 2 pints per acre. Do not treat within 5 days of harvest. (REI = 4 days).

STRAWBERRIES: For control of Aphids, Grasshoppers, Lygus Bugs, Mites, Salt-marsh Caterpillars and Strawberry Leafrollers, use 1 to 2 pints per acre. Do not apply more than 2 pints PHOSDRIN IPA 4 per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

FIELD CROPS

~~IMPORTANT : OBSERVE RESTRICTED-ENTRY INTERVALS (REI) AND WORKER PROTECTION STANDARD STATEMENTS ON LABEL AFFIXED TO PRODUCT CONTAINER.~~

Delete
Field
Crops

~~ALFALFA (INCLUDING SEED ALFALEA), CLOVER: For control of Alfalfa Caterpillars, Alfalfa Weevil Larvae, Aphids, Cutworms (climbing), Grasshoppers, Leafhoppers, Lygus Bugs and Mites, use ½ to 1 pint per acre. Do not treat within 3 days of harvest. Do not feed treated seed to livestock. (REI = 72 hours).~~

VEGETABLE CROPS

IMPORTANT : OBSERVE RESTRICTED-ENTRY INTERVALS (REI) AND WORKER PROTECTION STANDARD STATEMENTS ON LABEL AFFIXED TO PRODUCT CONTAINER.

ARTICHOKES: For control of Aphids and Plume Moths, use 1 to 2 pints per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

BROCCOLI, BRUSSEL SPROUTS, CABBAGE, CAULIFLOWER: For control of Aphids, Cabbage Loopers, Cutworms (climbing), Dipterous Leafminers (adult), Grasshoppers, Imported Cabbageworms, Leafhoppers, Lygus Bugs, Mites and Salt-marsh Caterpillars, use 1 to 2 pints per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

CELERY: For control of Aphids, Cabbage Loopers, Dipterous Leafminers (adult), Leafhoppers, Lygus Bugs, Mites and Salt-marsh Caterpillars, use 1 to 2 pints per acre. Do not treat within 5 days of harvest. (REI = 72 hours).

COLLARDS, KALE: For control of Aphids, Cabbage Loopers, Cutworms (climbing), Dipterous Leafminers (adult), Grasshoppers, Imported Cabbageworms, Leafhoppers, Lygus Bugs, Mites and Salt-marsh Caterpillars, use ½ to 1 pint per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

LETTUCE: For control of Aphids, Cabbage Loopers, Corn Earworms, Cutworms (climbing), Dipterous Leafminers (adult), False Chinch Bugs, Grasshoppers, Imported Cabbageworms, Lygus Bugs, Mites, Salt-marsh Caterpillars and Thrips, use ½ to 2 pints per acre. (REI = 72 hours).

Head Lettuce: When applying ½ to 1 pint per acre, do not treat within 3 days of harvest. When using over 1 pint per acre, do not treat within 4 days of harvest.

Leaf Lettuce (including Butter or Boston, Greenleaf, Redleaf and Romaine): When applying ½ to 1 pint per acre, do not treat within 7 days of harvest. When using over 1 pint per acre, do not treat within 10 days of harvest.

MELONS (INCLUDING CANTALOUPE, HONEYDEW MELONS, MUSKMELONS, WATERMELONS) : For control of Aphids, Cabbage Loopers, Cutworms (climbing), Dipterous Leafminers (adult), False Chinch Bugs, Grasshoppers, Leafhoppers, Lygus Bugs, Mites and Salt-marsh Caterpillars, use ½ to 1 pint per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

MUSTARD GREENS : For control of Aphids, Cabbage Loopers, Dipterous Leafminers (adult), False Chinch Bugs, Grasshoppers, Imported Cabbageworms, Leafhoppers and Mites, use ½ to 1 pint per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

PARSLEY : For control of Aphids, use 1 to 2 pints per acre using a minimum of 40 gallons of water per acre by ground application or a minimum of 10 gallons of water per acre by air application. When applying 1 pint per acre, do not treat within 7 days of harvest. When applying over 1 pint per acre, do not treat within 10 days of harvest. (REI = 72 hours).

Succulent Only
PEAS (INCLUDING VINES) : For control of Aphids, Cutworms (climbing), Grasshoppers, Leafhoppers and Mites, use ½ to 1 pint per acre. Do not treat within 3 days of harvest. (REI = 72 hours).

SPINACH : For control of Aphids, Cabbage Loopers, Cutworms (climbing), Dipterous Leafminers (adults), False Chinch Bugs, Grasshoppers, Imported Cabbageworms, Leafhoppers, Mites and Salt-marsh Caterpillars, use ½ to 2 pints per acre. When using ½ to 1 pint per acre, do not treat within 4 days of harvest. When using over 1 pint per acre, do not treat within 7 days of harvest. (REI = 72 hours).

WARRANTY

By using this product, the user accepts the following:

LIMITED WARRANTY: AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on this label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions and other statements on this label are based upon reasonable experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops and upon reports of field experience. Testing has not been performed on all varieties of food crops and plants, in all States or under all application, weather and crop conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. AMVAC NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY WARRANTY, EXPRESS OR IMPLIED. AMVAC EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER WARRANTY OF QUALITY OR PERFORMANCE.

THIS WARRANTY DOES NOT EXTEND TO, AND THE USER SHALL BE SOLELY RESPONSIBLE FOR, ANY LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THIS LABEL'S DIRECTIONS, WARNINGS OR CAUTIONS.

USER'S EXCLUSIVE REMEDY AND AMVAC'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY CLAIM, LOSS, DAMAGE OR INJURY RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, SHALL BE LIMITED TO, AT AMVAC'S OPTION, TO REPLACEMENT OF, OR REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL AMVAC OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC CHEMICAL CORPORATION

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