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FILE

JAN 16 1992

Mr. Jack L. Prieur
AMVAC Chemical Corp.
4100 East Washington Blvd.
Los Angeles, CA 90023

Dear Mr. Prieur:

Subject: Metam-Sodium Label Amendments
Metam Sodium
EPA Registration No. 5481-350
Metam Sodium Soil Fumigant For All Crops
EPA Registration No. 5481-418
AMVAC Metam
EPA Registration No. 5481-420
Your Applications of December 5, 1991

Labeling you submitted pursuant to the agreement signed by the Metam-Sodium Task Force and the United States Environmental Protection Agency (EPA) has been reviewed and found to be acceptable with the following comments:

For products, Metam Sodium, EPA Registration No. 5481-350, and Metam Sodium Soil Fumigant for All Crops, EPA Registration No. 5481-418, make the following label changes.

1. For both the label and in the booklet, under Environmental Hazards, change the second sentence to read "Do not contaminate water when disposing of equipment washwaters."
2. Under the Precautionary Statements Section C, insert the words, "monitoring application equipment" between "ground application equipment" and "or entering treated fields".

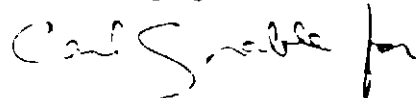
For product, AMVAC Metam, EPA Registration No. 5481-420, make the following label changes.

1. Same comments as outlined for item #1 above.
2. Since the label uses do not include chemigation as an application method for the small area use product, delete references to chemigation in the Protective Clothing and Equipment Section.
3. Under "Protective Clothing and Equipment Requirements", in paragraphs 1a and 3a, capitalize and underline "fit-tested".
4. Under "Reentry and Worker Safety Statement, in the third sentence, delete "as described in the Protective Clothing Statement on this label" and add "(chemical resistant footwear and body covering with long sleeves and long pants; a respirator if odor is detected and chemical resistant gloves if direct contact with the product is involved)."
5. Under General Instructions, clarify item i. Posting is the only required for non-tarped areas.
6. Under "Prevention of root graft-----", change to read "Drill holes in soil approximately-----".
7. Under "Treatment of Potting Soils", assure that the dosage rate under "cement mixer" is correct. It would seem that rates for both shredder and cement mixer would be equivalent. Previously accepted labels for similar products recommend 1 fl. oz. per 2 cu. ft. for both methods.

Submit five (5) copies of the final printed label.

If you have any questions regarding this matter, please contact me or Sidney Jackson at (703) 305-7610.

Sincerely yours,



Susan T. Lewis
Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (H7505C)

includes, but is not restricted to, chemigation equipment, shanks, tillers, drop lines, and holding tanks; sampling; clean up of spills; fumigant transfer; and rinsate disposal, or by any other person engaging in activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are done within 6 feet of unshielded, pressurized hoses containing Metam Sodium.

(1). A properly FIT TESTED NIOSH- or MSHA approved half-face respirator with organic vapor cartridge plus non-venting chemical goggles, or a NIOSH- or MSHA -approved full-face respirator with organic vapor cartridges. (2) Body covering that has long sleeves and long pants. When a closed system is not used, mixers and loaders must also wear chemical resistant apron or cloth coveralls. (3). Chemical resistant gloves and boots.

B. The following protective clothing must be worn at all times by persons operating or monitoring application equipment or entering treated fields within 48 hours after completion of application. See REENTRY AND WORKER SAFETY STATEMENT on this label. (1) Chemical resistant footwear. (2). Body covering that has long sleeves and long pants.

C. The following protective clothing and equipment must be immediately available at all times for use by persons operating tractor drawn ground application equipment, or entering treated fields within 48 hours after completion of application. See REENTRY AND WORKER SAFETY STATEMENT on this label:

(1). A properly FIT TESTED NIOSH- or MSHA- approved half-face respirator with organic vapor cartridge plus non-venting chemical goggles, or a NIOSH- or MSHA approved full-face respirator with organic vapor cartridges. This equipment must be worn when the pungent, rotten egg odor of Metam Sodium is detected.

(2). Chemical resistant gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including operations listed in the preceding paragraph A above.

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TREATMENT OF TREE REPLANT SITES IN COMMERCIAL ORCHARDS

After removing dead or diseased trees and as much of the root system as possible, make a shallow basin over the planting site. Add Metam Sodium to the stream of water while filling the basin. Use 1 quart of Metam Sodium per 100 sq. ft. in sufficient water (depending on the soil type) to penetrate at least 6 ft. For control of Oak Root Fungus, use a basin of at least 20 ft. x 20 ft. square. Increase dosage to 2 quarts per 100 sq. ft. in sufficient water to penetrate to the depth of the root system. If water is tanked to the planting site, add Metam Sodium to the water and mix before filling the basin. Tarping of replant sites is required when near (1/2 mile) to populated areas such as schools, hospitals, commercial or office buildings, factories, residential areas, etc. Tarping is not required if treatment is further than 1/2 mile from such populated areas.

SYMPHYLID CONTROL

Soil should be in good bed condition to a depth of 8 to 10 inches. Maintain adequate soil moisture during the Spring season to bring symphylids to the upper soil surface. Treat during July- August when symphylids are in the upper soil surface. Apply as a broadcast treatment at 20 gallons METAM SODIUM per acre using blade or chisel injectors. Inject below level of Symphylid concentration, usually 6 to 8 inches. Pack soil with a roller immediately after application.

WHEN TO USE MAXIMUM AND MINIMUM RATES

The application rate of METAM SODIUM is dependent on the soil type to be treated and the portion in the soil of the pest to be suppressed or controlled. Generally a light sandy soil requires a lower application rate than a heavier mineral soil. In addition, if the pest is in the upper portion of the soil profile (annual weeds) a lower application rate is generally required than if the pest is deeper in the soil profile and deeper penetration is desired (perennial weed seeds). Where a range of application rates is given in this label consult your local agricultural extension service for more specific information.

STATEMENTS CONCERNING CHEMIGATION OF METAM SODIUM

Apply this product only through [choose one or more of the following types of systems: sprinker including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move, flood (basin), furrow, border, or drip (trickle)] irrigation system(s).

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REENTRY AND WORKER SAFETY STATEMENT

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. Do not enter treated areas for 48 hours after application unless protective clothing is worn (Chemical resistant footwear and body covering with long sleeves and long pants; respirator, if odor is detected, and chemical resistant gloves, if direct contact with product is involved). Because certain States may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warning must be given to workers who are expected to be in treated areas or in an area 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 a reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information.

WARNING: Area treated with Metam Sodium on Date (____). Do not enter without appropriate protective clothing for 48 hours after application. In case of accidental exposure see STATEMENT OF PRACTICAL TREATMENT found on the Metam Sodium label. Posting is also required. Consult your State Department of Agriculture for further information.

ENVIRONMENTAL HAZARDS

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 by cleaning of equipment or disposal of wastes. Do not contaminate irrigation ditches or water used for irrigation or domestic purposes. Do not apply when conditions favor drift from treated areas. Do not use in a greenhouse.

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Do not apply this product through any other type of irrigation system. Crop injury, lack of effectiveness or illegal pesticide residues in the crop can result from nonuniform distribution of treated water. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

OBSERVE THE FOLLOWING PRECAUTIONS IF YOUR CHEMIGATION SYSTEM IS CONNECTED TO A PUBLIC WATER SYSTEM

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of a year.

Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction.

There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top of overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid toward the injection pump.

The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

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METAM SODIUM

SOIL FUMIGANT SOLUTION FOR ALL CROPS

Refer to Supplemental PRODUCT USE & CHEMIGATION BOOKLET for Additional Instructions
MAY BE APPLIED BY SPRINKLER, SOIL INJECTION, OR CHEMIGATION
FOR CONTROL OF SOIL-BORNE PESTS THAT ATTACK
ORNAMENTALS, FOOD AND FIBER CROPS.

Controls Weeds such as Annual Bluegrass, Bermudagrass, Chickweed,
Dandelion, Ragweed, Henbit, Lambsquarter, Amaranthus species,
Watergrass, Johnson Grass, Nutgrass, Wild Morning-glory and Purslane.
Nematodes and Symphylids

Soil-Borne diseases such as Rhizoctonia, Pythium, Phytophthora, Verticillium,
Sclerotinia, Oak Root Fungus and Club Root of Crucifers.

ACTIVE INGREDIENT: Sodium methylthiocarbamate (anhydrous)	32.7%
INERT INGREDIENTS:	67.3%
TOTAL	100.0%

Contains 3.18 lbs. Active Ingredient METAM SODIUM per gallon

KEEP OUT OF REACH OF CHILDREN WARNING

"PRECAUCION AL USUARIO Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente"

STATEMENT OF PRACTICAL TREATMENT

Immediately start the procedures below and contact a Poison Control Center, a physician or the nearest hospital. Describe the type and extent of exposure, the victim's symptoms and follow the advice given.
IF ON SKIN: Immediately flush skin with large amounts of running water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately. **IF IN EYES:** Immediately flush eyes with large amounts of water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately. **IF INHALED:** Remove to fresh air. If not breathing, clear the victim's airway and start mouth to mouth artificial respiration. If breathing is difficult, give oxygen, preferably with a physician's advice. Get medical attention immediately. **IF SWALLOWED:** Immediately give several glasses of water but do not induce vomiting. If vomiting occurs, give fluids again. Have a physician determine if condition of patient will permit induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or convulsing person.

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if inhaled or swallowed, irritating to eyes, nose, throat and skin. Avoid breathing vapors or spray mist. Do not get in eyes, on skin, or clothing. Causes skin irritation. May be fatal if absorbed through the skin. In case of contact, immediately remove contaminated clothing. Wash and dry clothing before reuse. Keep children & pets out of treated areas until treatment is completed and pesticide has dissipated.

PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS

A. The following protective clothing and equipment are required to be used by persons actually engaged in carrying out any operations that are likely to involve direct contact with Metam Sodium including mixing, loading, application equipment, calibrations or adjustments, clean up and repair of application equipment (equipment includes, but is not restricted to, chemigation equipment, shanks, bliers, drop lines, and holding tanks), sampling, clean up of spills, fumigant transfer, and residue disposal, or by any other person engaging in activities likely to result in direct contact with the product. This protective equipment must also be used for any operations that are done within 6 feet of unshielded, pressurized hoses containing Metam Sodium:

(1) A properly **FIT TESTED** NIOSH- or MSHA approved half-face respirator with organic vapor cartridge plus non-venting chemical goggles, or a NIOSH- or MSHA approved full-face respirator with organic vapor cartridges. (2) Body covering that has long sleeves and long pants. When a closed system is not used, mixers and loaders must also wear a chemical resistant apron or cloth coveralls. (3) Chemical resistant gloves and boots.

B. The following protective clothing must be worn at all times by persons operating or monitoring application equipment or entering treated fields within 48 hours after completion of application. See **REENTRY AND WORKER SAFETY STATEMENT** on this label. (1) Chemical resistant footwear. (2) Body covering that has long sleeves and long pants.

C. The following protective clothing and equipment must be immediately available at all times for use by persons operating tractor drawn ground application equipment, or entering treated fields within 48 hours after completion of application. See **REENTRY AND WORKER SAFETY STATEMENT** on this label:

(1) A properly **FIT TESTED** NIOSH- or MSHA- approved half-face respirator with organic vapor cartridge plus non-venting chemical goggles, or a NIOSH- or MSHA approved full-face respirator with organic vapor cartridges. The equipment must be worn when the pungent, rotten egg odor of Metam Sodium is detected. (2) Chemical resistant gloves. These must be worn when a person is engaged in carrying out any operation that is likely to involve direct contact with the product, including operations listed in the preceding paragraph A above.

(See Side Panel For Additional Precautionary Statements)

EPA REG. NO. 5481-418 EPA EST. NO. 5481-CA-1

NET CONTENTS GALLONS

AMVAC CHEMICAL CORPORATION

4100 East Washington Blvd. - Los Angeles, CA 90023 - U.S.A.

REENTRY AND WORKER SAFETY STATEMENT

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. Do not enter treated areas for 48 hours after application unless protective clothing is worn (Chemical resistant footwear and body covering clothing with long sleeves and long pants; respirator, if odor is detected, and chemical resistant gloves, if direct contact with product is involved). Because certain States may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information. Written or oral warning must be given to workers who are expected to be in treated areas or in an area 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 a reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information:

WARNING: Area treated with Metam Sodium on Date () Do not enter without appropriate protective clothing for 48 hours after application. In case of accidental exposure see **STATEMENT OF PRACTICAL TREATMENT** found on the Metam Sodium label. Posting is also required. Consult your State Department of Agriculture for further information.

ENVIRONMENTAL HAZARDS

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 by cleaning of equipment or disposal of wastes. Do not contaminate irrigation ditches or water used for irrigation or domestic purposes. Do not apply when conditions favor drift from treated areas. Do not use in a greenhouse.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Refer to Supplemental **PRODUCT USE and CHEMIGATION BOOKLET**. Do not apply this product through any irrigation system unless the supplemental labeling in this **BOOKLET**, or the chemigation instructions on this label, are followed.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Store product in a cool, dry, locked place out of reach of children. Do not store below 0° F. Product crystallizes at lower temperatures. If exposed, warm or store at higher temperatures and mix to redissolve crystals and assure uniformity before use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or residue is a violation of Federal law. If these wastes cannot be disposed of 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:** (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. Puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by State and local authorities by burning. If burned, stay out of smoke.

GENERAL INSTRUCTIONS: Before applying this product, always thoroughly cultivate the area to be treated, breaking up clods and loosening soil deeply and thoroughly. A week before treatment, moisten soil after cultivation to the desired depth, sprinkle or flood irrigate. This step is essential for all methods of use. Immediately before application, cultivate lightly if the soil has crusted. See **POTATOES** section for specific directions on the application of Metam Sodium to potato fields where no-till stubble or cover crop exist. To prevent loss from evaporation, use only at times when air temperature is moderate and there is little wind movement. Soil temperature must be from 40 to 90 degrees F. in the treated zone. Treated zone is defined as the depth of treatment that Metam Sodium achieves at the time of application. For other conditions, see section, **"CULTIVATION AND PLANTING AFTER APPLICATION"**.

Do not apply to soil surface, as in the sprinkler method, when air temperature is over 90 degrees F. or when low humidity or high winds would cause loss of Metam Sodium before it can be drenched into the soil with additional water. If fumes become unpleasant during treatment, apply more water to seal the fumes into the soil where they should be confined to achieve maximum fumigation benefit.

The activity of METAM SODIUM is increased by the use of tarp (plastic, paper or fabric) spread loosely over the treated areas and secured to prevent removal by wind. Keep covered for a minimum period of 48 hours. Seven days after treatment cultivate areas to depth of 2 inches to aerate the soil. Do not seed earlier than 21 days after application when tarping method is used. Use promptly after mixing with water. Do not allow solution to stand. Flush equipment with water after each day's use. Disassemble valves and clean carefully.

"CULTIVATION AND PLANTING AFTER APPLICATION": Do not apply to soil surface, as in the sprinkler method, when air temperature is over 90 degrees F. or when low humidity or high winds would cause loss of Metam Sodium before it can be drenched into the soil with additional water. If fumes become unpleasant during treatment, apply more water to seal the fumes into the soil where they should be confined to achieve maximum fumigation benefit.

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PRODUCT INFORMATION

METAM SODIUM is a water soluble liquid. When applied to prepared soil, the liquid is converted into a gaseous fumigant. Sufficient interval of time, the gas dissipates leaving the soil ready for planting.

WHEN TO USE MAXIMUM AND MINIMUM RATES

The application rate of METAM SODIUM is dependent on the soil to be treated and the position in the soil of the pest to be suppressed or controlled. Generally a light sandy soil requires a lower application rate than a heavier mineral soil. In addition, if the pest is in the upper portion of the soil profile (annual weeds) a lower application rate is generally required than if the pest is deeper in the soil profile and deeper penetration is desired (perennial weed seeds). When a range of application rates is given in this label consult your local agricultural extension agent for more specific information.

METAM SODIUM is recommended for the control of the following soil-borne pests that attack ornamental, food and fiber crops:

Weeds and germinating weed seeds: Annual Bluegrass, Bermudagrass, Chickweed, Dandelion, Ragweed, Henbit, Lambsquarter, Amaranthus species (Pigweed & Careless Weed), Watergrass, Johnson Grass, Nutgrass, Wild Morning-glory and Purslane; **Nematodes and Symphylids:** Centipede and **Soil-borne Diseases** such as (Rhizoctonia, Phytophthora, Verticillium, Sclerotinia, Oak Root Fungus and Club Root of Crucifers).

USE PRECAUTIONS: Keep children and pets out of treated area. Do not apply to desirable lawns and plants. Do not apply within 3 feet of the drip line of desirable plants, shrubs or trees. Do not use in confined areas where fumes may enter nearby houses. Do not use in greenhouses. Store container tightly closed when not in use. Do not store near feed or fertilizer.

CULTIVATION AND PLANTING AFTER APPLICATION

On well drained soil of light to medium texture which are not over wet or cold following application, planting may take place 14 to 21 days after treatment. If soils are heavy or especially high in organic matter, remain wet and/or cold (below 60°F.) following application of Metam Sodium an extended interval should be observed. Where dosage is greater than 100 gals. per acre, wait at least 60 days. On heavy, wet soils, light surface cultivation to break up crusting and promote drying of soil should be done 5 to 7 days after application. This cultivation should be repeated as necessary. To avoid reinfesting treated soils, cultivation practices should be such that untreated soils are not mixed with treated soils.

SPECIAL INSTRUCTIONS: When treating heavier soils, including those high in clay or organic matter, it is essentially important that the soil be allowed to aerate and dry thoroughly after using METAM SODIUM. On cold and/or wet weather, frequent shallow cultivations may aid the penetration of METAM SODIUM from the soil. If in doubt transplant a seedling and examine for injury before planting crop.

FIELD APPLICATION - WHERE ENTIRE AREA IS BEING TREATED: **SOIL INJECTION:** Space thin injection shank 5 inches apart and apply METAM SODIUM 4 inches deep into well prepared soil. Follow immediately with a roller to smooth and compact the soil surface. Light watering or a tarp after rolling helps to prevent gas escape. For field use 40 to 100 gallons of METAM SODIUM per acre is recommended. **ROTARY TILLER or POWER MULCHER:** Spray METAM SODIUM immediately in front of the blier or mulcher. Use 50 to 100 gallons per acre immediately with a roller to seal soil surface. Light watering or a tarp after rolling helps to prevent gas escape.

SPRINKLER SYSTEM: Use only those sprinkler systems which give uniform water droplets to prevent excessive loss. Use 75 to 100 gallons of METAM SODIUM per acre. For control of shallow pests (top 1 ft. of soil) apply sprinklers 5 to 10 minutes. In next 10 to 20 minutes inject all METAM SODIUM needed for the area covered. On very light soils keep moist by sprinkling for 2 to 3 days. For control of pests deeper than 1 inch in the soil, divide METAM SODIUM into 3 or more equal portions and apply at intervals during the sprinkling period.

CALIFORNIA ONLY: Application must be in compliance with Technical Information Bulletin - California: "Application Guidelines for Control of Soil-Borne Pests Through Sprinkler Irrigation System". This information bulletin may be obtained from your local pesticide dealer or a Metam Sodium registrant.

CHECK OR FLOOD IRRIGATION: Meter METAM SODIUM at a rate into water during irrigation. Apply 50 to 100 gal. per acre depth upon the land of pest and depth desired, in 3" to 18" of water per inch of soil.

FIELD APPLICATION TO BEDS OR ROWS: **SOIL INJECTION:** METAM SODIUM may be injected into pre-formed beds following the directions given above under soil injection. If treated band is desired space 2 or more shanks at intervals of 5 inches cover the desired treating width. Use thin injection shank(s) and apply METAM SODIUM 4 inches deep into well prepared soil. Follow immediately with a roller to seal chisel channel(s). Light watering or a tarp after rolling helps to prevent gas escape. Apply at the rate of 49.2 to 120 ounces / 1,000 linear feet of bed per chisel (40 to 100 gals./treat