

5481-462

12/30/2003

Page 187



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 30 2003

Mr. Jon C. Wood
AMVAC Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660

Subject: Amendment Updating First Aid per PR Notice 2001-1; Revising Ingredient, Spanish Language and Respirator Statements; and Making Other Minor Changes
AMVOS Liquitech
EPA Reg. No.: 5481-462
Your Submission Dated September 29, 2003

Dear Mr. Wood:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments below. Two copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Change "Inert Ingredients" to "Related Compounds" as on the previously accepted label. Certain of the impurities in the product's formulation may be considered "related compounds." Before we will approve use of "Inert Ingredients", you must submit data and/or a justification to show that the product's impurities are, in fact, inert ingredients.
2. In the Directions for Use, under "Aerosol/Fogger Formulations" on page 2, revise the rates given for products containing less than and greater than 1.0% to read "Treatment at 0.5 grams a.i. per 1,000 cubic feet maximum." [Note: "a.i." is missing in each case.]
3. In item 5 under "Aerosol/Fogger Spray Can - Not Total Release" on page 3, change "or" to "of" near the beginning of the sentence, so that it reads "Do not use in food/feed areas of food/feed handling establishments, restaurants, ..."
4. Revise the last sentence of the third paragraph under "Limited Warranty and Disclaimer" to read "To the extent allowed by law, manufacturer or seller shall not be liable for any special, indirect or consequential damages resulting from the use or handling of this product." As currently written ("In no event, shall manufacturer or seller be liable ...")

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the statement negates and/or detracts from labeling requirements as set forth by the Agency in 40 CFR Part 156, and is, therefore, considered misbranding.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,



George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

3 8 7

AMVOS LIQUITECH

AN INSECTICIDE FOR FORMULATING USE ONLY

ACTIVE INGREDIENT:

Dichlorvos (2,2-Dichlorovinyl dimethyl phosphate) 98.0%

INERT INGREDIENTS:..... 2.0%

TOTAL: 100.0%

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

DEC 30 2003



KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

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

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.)

5481-462

FIRST AID

Organophosphate

If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

EMERGENCY INFORMATION

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

Transportation: CHEMTREC 1-800-424-9300
Other: AMVAC 1-323-264-3910

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) 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 30 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injections as a 5 percent solution in water over not less than 2 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 cholinesterase regeneration has been attained as determined by blood test.

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE

EPA Reg. No. 5481-462
EPA Est. No. 5481-CA-1

Net Weight:
As Marked on Container



4100 E. Washington Blvd.
Los Angeles, CA 90023 U.S.A
1-323-264-3910 • www.amvac-chemical.com

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

REQUIRED PROTECTIVE CLOTHING

Persons who handle this product must wear the following protective clothing:

- 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)
- Respirator with either an organic vapor-removing cartridge with a prefilter number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter
- Chemical-resistant apron

ENVIRONMENTAL HAZARDS

This product is toxic to birds, fish, and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Keep away from heat or open flame.

Formulators using this product are responsible for obtaining EPA registration of their formulated products and to provide data to support their registrations.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS. FOR FORMULATION OF DICHLORVOS INSECTICIDE PRODUCTS ONLY AS LISTED ON THIS PRODUCT LABEL.

This product is intended only for use in the formulation of other Dichlorvos insecticide products. Products formulated using Amvos Liquitech will require registration with the Environmental Protection Agency. This product is for formulation into end-use products intended only for use on the following sites. The use sites for which Dichlorvos products may be used are formulation specific. Any limitations, cautions, restrictions or instructions stated below for any particular use site or formulation must be incorporated in the "end-use" label language.

AEROSOL/FOGGER FORMULATIONS

TOTAL RELEASE AEROSOL/FOGGER:

Percentage of DDVP A.I. 1.0% or less. Treatment at 0.5 grams per 1,000 cubic feet maximum.

For use only in homes, cabins, garages, basements, animal buildings, and dairy milk rooms.

1. After application, do not reoccupy premises for at least 2 hours. Before reoccupying, open all doors and windows and ventilate thoroughly for at least 1 hour.
2. Do not use in kitchens unless food/feed are removed or covered during treatment. Cover all food/feed preparation surfaces, dishes and food/feed handling equipment before treatment. Thoroughly wash all food/feed preparation surfaces, dishes and food/feed handling equipment after treatment.

TOTAL RELEASE AEROSOL/FOGGER:

Percentage of DDVP A.I. greater than 1.0%. Treatment at 0.5 grams per 1,000 cubic feet maximum.

For use only in homes, warehouses, railroad cars, theaters and industrial plants.

1. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.
2. After application, do not reoccupy treated areas for at least 2 hours. Before reoccupying, open all doors and windows and ventilate thoroughly for at least 1 hour.
3. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement.
4. Do not use in kitchens unless food/feed are removed or covered during treatment. Cover all food/feed preparation surfaces, dishes and food/feed handling equipment before treatment. Thoroughly wash all food/feed preparation surfaces, dishes and food/feed handling equipment after treatment.
5. Do not use to treat non-perishable packaged or bagged and/or bulk stored raw or processed agricultural commodities.

AEROSOL/FOGGER SPRAY CAN-NOT TOTAL RELEASE

For crack and crevice use only in homes, cabins, garages, basements, animal buildings, dairy milk rooms, warehouses and industrial plants.

1. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.
2. Do not use as a space spray, use only as crack and crevice treatment. For residential crack and crevice use, do not apply DDVP containing products more frequently than once per month.
3. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement.
4. Do not use to treat non-perishable packaged or bagged and/or bulk stored raw or processed agricultural commodities.
5. Do not use in food/feed areas or food/feed handling establishments, restaurants, or other areas where food/feed is commercially prepared or processed, in serving areas while food/feed is exposed or facility is in operation.

COMMERCIAL AEROSOL/FOGGERS FOR THE FOLLOWING USES

For use in warehouses, silos, bulk bins and food/feed processing, food/feed manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food/feed commodities or bulk raw or processed food/feed commodities and non-food/feed areas of processing/ manufacturing plants, at 2.0 grams a.i./1000 cubic feet maximum. Non-food/feed processing and manufacturing plant use areas include garbage rooms, lavatories, floor drains (to sewers entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

- a. Keep a minimum of a 7-day interval between applications except on cocoa beans and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams A.I. per 1,000 cubic feet of head space.
 - b. Do not make applications when temperatures are below 60°F.
1. All treatments should be made during the hours when buildings are unoccupied. Buildings treated should be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow unprotected workers to enter building during treatment. Place WARNING signs at entrances stating:

THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS.

THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL PROTECTION EQUIPMENT FOR 24 HOURS; OR, UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE" (eg. A Drager Tube) INDICATES THAT THE DDVP AIR CONCENTRATION IS EQUAL TO, OR LESS THAN, 50% OF THE PEL (0.1 PPM); AN AIR CONCENTRATION OF 0.05 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPEMENT.

DO NOT ENTER PRIOR TO _____ AM OR PM ON _____ (Date) WITHOUT PERSONAL PROTECTION EQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE 50% OF THE PEL OR LESS.

2. FOR SALE TO, USE AND STORAGE BY COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL APPLICATORS ONLY. The term "non-perishable" means any raw or processed food/feed not subjected to rapid decay or deterioration that would render it unfit for consumption. Raw commodities would include: Animal feed, cocoa beans, dried beans, grain crops, peanuts, soybeans and nut crops. Raw commodities do not include: eggs, milk, meat, poultry, fish, fresh fruits and vegetables. Processed food/feed would include: flour, sugar, cereals, packaged goods and crackers. Processed food/feed do not include: hermetically sealed food/feed or manufactured dairy products and other processed food/feed requiring freezing or refrigeration.
3. When using in food/feed processing, food/feed manufacturing, handling and storage areas:
 - a. Apply only during times when plant is not in operation and no food/feed products are exposed. If bulk, un-packaged food/feed are exposed, remove or cover before treatment begins.
 - b. All food/feed processing surfaces should be covered during treatment or thoroughly cleaned before using.

NOTE: USE IS PROHIBITED IN:

Food/feed manufacturing establishments: bottling plants (including wineries, breweries, soft drinks); frozen food/feed (including pizza plants and ice cream plants) excluding non- food/feed manufacturing areas.

Food/feed processing establishments: meat, poultry and seafood slaughtering and/or packing plants (including edible fats and oils), frozen food/feed plants (including fruit and vegetables), dairy product plants (including milk processing plants) excluding non-food/feed processing areas.

LIQUID FORMULATIONS

LIQUID FORMULATIONS FOR AGRICULTURAL/COMMERCIAL USE ONLY:

For use in areas under the general category of farm buildings, (farm yards); manure treatments on farm premises; dairy and farm premises; feed lots, including around feed lots, stockyards, corrals, holding pens, fences etc.; animal buildings, including barns, feeding areas, shelters and stables; dairy barns (including milk rooms, equipment and barnyards); livestock feeding areas; pens, poultry droppings, poultry houses (equipment and yards); beef cattle, poultry, dairy cattle, goats, horses (including ponies), sheep, swine and turkeys.

1. All formulations, for the above uses must state: FOR AGRICULTURAL/COMMERCIAL USE ONLY. NOT FOR SALE FOR ANY OTHER USES.
2. Do not make direct applications to livestock more frequently than once per day.

Liquid Formulations for the following uses:

Indoor crack and crevice use in non-food/feed areas of commercial/institutional and industrial areas; domestic dwellings (including campers, hotels, motels, tourist courts). For outdoor use including patios and lawns; kennels, including outside runways, window sills and ledges; outside surfaces of buildings, including porches, screens, window frames, eaves, patios, garages; refuse dumps; refuse and solid waste containers; wine cellars.

1. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.
2. For indoor use, only crack and crevice treatments are permitted. Space spray use is prohibited.
3. Do not use in hospitals or clinical rooms, such as patient rooms, wards, nurseries, operating or emergency areas. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement.
4. Do not use in food/feed handling establishments, restaurants, or areas where food/feed is prepared or processed. Do not use to treat non-perishable bagged and/or bulk stored raw or processed agricultural commodities.
5. Do not treat more than 5 application sites per day and do not make DDVP applications more than once per week.

Liquid Formulations for the following uses:

For use, in mushroom houses and greenhouses (non food crops) at 2.0 grams a.i./1000 cubic feet maximum.

1. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS OR CERTIFIED APPLICATORS ONLY.
2. Keep a minimum of 7 day interval between applications.

LIQUID FORMULATIONS FOR USE ONLY IN COMMERCIAL APPLICATION EQUIPMENT SUCH AS CONVENTIONAL OR ULV FOGGING EQUIPMENT (SPACE TREATMENT):

For use in warehouses, silos, bulk bins and food/feed processing, food/feed manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food/feed commodities or bulk raw or processed food/feed commodities and non-food/feed areas of processing/ manufacturing plants, at 2.0 grams a.i./1000 cubic feet maximum. Non-food/feed processing and manufacturing plant use areas include garbage rooms, lavatories, floor drains (to sewers entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

- a. Keep a minimum of a 7 day interval between applications except on cocoa beans and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams a.i. per 1,000 cubic feet of head space.
 - b. Do not make applications when temperatures are below 60°F.
1. All treatments should be made during the hours when buildings are unoccupied. Buildings treated should be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow unprotected workers to enter buildings during treatment. Place WARNING signs at all entrances stating:

THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS.

THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL PROTECTION EQUIPMENT FOR 24 HOURS; OR, UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE (eg. A Drager Tube) INDICATES THAT THE DDVP AIR CONCENTRATION IS EQUAL TO, OR LESS THAN, 50% OF THE PEL (0.1 PPM); AN AIR CONCENTRATION OF 0.05 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPMENT.

DO NOT ENTER PRIOR TO _____ AM OR PM ON _____ (Date) WITHOUT PERSONAL PROTECTION EQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE 50% OF THE PEL OR LESS.

2. FOR SALE TO, USE AND STORAGE BY COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL APPLICATORS ONLY. The term "non-perishable" means any raw or processed food/feed not subject to rapid decay or deterioration that would render it unfit for consumption. Raw commodities would include: Animal feed, cocoa beans, dried beans, grain crops, peanuts, soybeans and nut crops. Raw commodities do not include: eggs, milk, meat, poultry, fish, fresh fruits and vegetables. Processed food/feed would include: flour, sugar, cereals, packaged goods and crackers. Processed food/feed do not include: hermetically sealed food/feed or manufactured dairy products and other processed food/feed requiring freezing or refrigeration.

- 3. When using in food/feed processing, food/feed manufacturing, handling and storage areas:
 - a. Apply only during times when plant is not in operation and no food/feed products are exposed. If bulk, unpackaged food/feed are exposed, remove or cover before treatment begins.
 - b. All food/feed processing surfaces should be covered during treatment or thoroughly cleaned before using.

NOTE: USE IS PROHIBITED IN:

Food/feed manufacturing establishments: bottling plants (including wineries, breweries, soft drinks), frozen food/feed (including pizza plants and ice cream plants) excluding non-food/feed manufacturing areas.

Food/feed processing establishments: meat, poultry and seafood slaughtering and/or packing plants (including edible fats and oils), frozen food/feed plants (including fruit and vegetables), dairy product plants (including milk processing plants) excluding non-food/feed processing areas.

STORAGE AND DISPOSAL

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

DRUM HANDLING: Handle carefully to prevent damage and leakage. Open drums only when set on end and under a ventilated hood. Unscrew bungs slowly to release internal pressure.

STORAGE: Store product in original container in a cool, dry, locked place out of reach of children.

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: (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.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

Amvac Chemical Corporation
4100 E. Washington Blvd.
Los Angeles, CA 90023 U.S.A.
1-323-264-3910
www.amvac-chemical.com

