



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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Newport Beach, CA 92660

JUL 15 2010

Subject: VAPAM HL
EPA Reg. No. 5481-468
Metam Alliance's Request on Your Behalf to Amend Label

Dear Mr. Chart:

In the Agency letter of April 30, 2010, the Agency approved amended labeling for this registration with the condition that specific label revisions be made to the April 30, 2010 label stamped "Accepted with Comments". This letter further amends the April 30, 2010 letter by revising the label comments and by requiring additional changes.

1. (Label p.3) (EPA Comment 3-b) (Alliance issue #17)
Replace EPA's comment with this text:
 - In the "User Safety Requirements" section, add the following sentences: "DO NOT transport contaminated clothing inside a closed vehicle unless stored in a sealed container. Wash or dispose as specified."
2. (Label p.3) (EPA Comment 3-d) (Alliance issue # 1)
Replace EPA's comment with this text:
 - To the "Directions for Use" section, add the following text: "Do not apply when wind speed favors drift beyond the area intended for treatment. Do not use in a greenhouse or any other enclosed structure or confined area."
3. (Label p.3) (EPA Comment 3-f) (Alliance issue # 3)
Disregard EPA's comment to add additional California restrictions back on the label.
4. (Label p.5) (EPA Comment 5-d) (Alliance issue #7)
Replace EPA's comment with this text:
 - At the end of the "Protection for Handlers" section, add the following sentence:

“Cartridges or canisters must be replaced when odor or irritation from this product becomes apparent, if the measured concentration of MITC is greater than 6000 ppb, or after 8 hours of use, whichever occurs first.”

5. (EPA Comment 9-h) (Alliance issue # 9)
Disregard EPA’s comment about air temperature.

6. (Label p.16) (EPA Comment 9-j) (Alliance issue # 8)
Replace EPA’s comment with this text:
 - In the wind speed section of the “Center Pivot” section, replace the first two bullets with the following:
 - For sprinkler or **center pivot** applications: 1) not using a solid stream type nozzle, OR 2) having a release height or spray height greater than 4 feet, OR 3) having 30 lbs or greater PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 10 mph.

 - For sprinkler or **center pivot** applications using 1) a solid stream, AND 2) having release height and spray height less than 4 feet, AND 3) having 29 lbs. or less PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 25 mph.

7. (Multiple label pages) (Alliance issue # 12)
In the “Soil Conditions” sections of Solid Set Sprinkler; Drench; and Drip, Flood Basin, Furrow and Border applications, the first bullet must be revised to the following:
 - “Soil must be in good tilth and free of large clods. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone, tillage to fracture these layers must occur. The soil must be tilled prior to the application, at a minimum to the depth of the treatment zone.”

8. (Label p.25) (Alliance issue # 42)
Add the following to the “Application and Equipment Considerations” section of the GAP for Drip Application method:
 - “Nozzles and metering devices are of correct size and are sealed and unobstructed.”

9. (Label p.35) (Alliance issue # 32)
In the “Observe the Following Precautions...Public Water System” section, revise the text as follows:
 - Any alternatives to the ~~above~~ required safety devices in this label must conform to the list of EPA-approved alternative devices.

10. (Label pages 38 and 43) (Alliance issue # 33)
Delete all cross references to the former “General Precautions for Irrigation Systems” section.

- 11. (EPA Comment 16-a) (Alliance issue # 19A)
Disregard EPA's comment about the tobacco tarp method.

- 12. (Label p.47)
Verify that the warranty and disclaimer language is up to date. See the link below for further information.
<http://www.epa.gov/oppfead1/labeling/lrm/chap-12.htm#IX>

The label associated with these changes has been previously stamped "Accepted with Comments" and is dated April 30, 2010. Submit one copy of the final printed label that incorporates the required changes before the product is released for shipment. If you have any questions, please contact Cathryn O'Connell by phone at (703) 308-0136 or via email at occonnell.cathryn@epa.gov or Erik Kraft by phone at (703)308-9358 or via email at kraft.erik@epa.gov.

Sincerely,



Erik Kraft
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