

5481-481

02/28/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

FEB 28 2008

Mr. Jon C. Wood
Amvac Chemical Corporation
4695 McArthur Court, Suite 1250
Newport Beach, CA 92600

Subject: Label amendment
Trumpet EC
EPA Reg. No. 5481-481
Your submission dated December 10, 2007

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 listed below:

1. On page 3, ENVIRONMENTAL HAZARDS, add the following as third sentence in the first paragraph: "Before making the first application in a season, consult with the primary State agency responsible for regulating the pesticides to determine if permits are required or regulatory mandates exist."
2. On page 4, change the first sentence of the last paragraph starting as follows: "Treatment of a site must be based on pest surveillance results."
3. On page 5, under OPERATIONAL USE INSTRUCTIONS, change "should" to "must" in the first bullet.
4. On page 5, under OPERATIONAL USE INSTRUCTIONS, change "essential" to "required" in the fourth bullet.
5. On page 5, change "should" to "must" in the second sentence.

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A stamped copy of the label is enclosed for your records. Submit two (2) copies of the final printed label before you release the product for shipment bearing the revised labeling.

Sincerely,

Rita Kumar

Rita Kumar
Senior Regulatory Specialist
Insecticide-Rodenticide Branch
Registration Division (7505P)
E-mail: kumar.rita@epa.gov

Enclosure

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RESTRICTED USE PESTICIDE

DUE TO EYE AND SKIN CORROSIVITY HAZARD

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.

TRUMPET® EC

INSECTICIDE

FOR USE ONLY BY FEDERAL, STATE, TRIBAL, OR LOCAL GOVERNMENT OFFICIALS RESPONSIBLE FOR PUBLIC HEALTH OR VECTOR CONTROL, OR BY PERSONS CERTIFIED IN THE APPROPRIATE CATEGORY OR OTHERWISE AUTHORIZED BY THE STATE OR TRIBAL LEAD PESTICIDE REGULATORY AGENCY TO PERFORM ADULT MOSQUITO CONTROL APPLICATIONS, OR BY PERSONS UNDER THEIR DIRECT SUPERVISION. NOT FOR USE IN AND AROUND THE HOME BY HOMEOWNERS OR PROFESSIONAL APPLICATORS.

ACTIVE INGREDIENT:

Naled (1,2-dibromo-2,2-dichloroethyl dimethyl phosphate) 78.0%

INERT INGREDIENTS: 22.0%

TOTAL: 100.0%

Contains 10.8 pounds Naled per gallon.

Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

DANGER / PELIGRO

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.)

FIRST AID	
Organophosphate	
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently from the side of the eye 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.
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have 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 unless individual is contaminated with product. Call a poison control center or doctor for further 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 Only: CHEMTREC	1-800-424-9300
All Other: AMVAC	1-323-264-3910
NOTE TO PHYSICIAN	
Naled is an Organophosphate cholinesterase inhibitor. Contains petroleum distillates. Measurement of blood cholinesterase activity may be useful in monitoring exposure. If signs of cholinesterase inhibition appear, atropine sulfate is antidotal. 2-PAM (Protopam) is also antidotal and may be used in conjunction with atropine, but should not be used alone. Probable mucosal damage may contraindicate the use of gastric lavage. May pose an aspiration pneumonia hazard.	

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

EPA Reg. No. 5481-481

EPA Est. No. 5481-CA-1, 5481-AL-1



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

1-323-264-3910 • www.amvac-chemical.com

Net Contents: **ACCEPTED**
As Marked on Container **with COMMENTS**
in EPA Letter Dated **FEB 28 2008**

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

5481-481

480-20071210r7 Trumpet EC

FEB 28 2008

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. CORROSIVE. Causes irreversible eye and skin damage. Causes skin burns. May be fatal if swallowed. Harmful if inhaled or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are Barrier laminate, Butyl Rubber, Nitrile Rubber, and Viton.

Mixers, loaders, applicators, and other handlers must wear:

- Protective eye wear (goggles, face shield, or safety glasses)
- Long-sleeved shirt and long pants
- Socks plus shoes
- Chemical-resistant gloves (barrier laminate, butyl rubber, nitrile rubber, or viton, selection category E) and apron when mixing or loading

See engineering controls for additional requirements.

Mixers, loaders, applicators and other handlers engaged in those handler activities for which use of an engineering control is not possible, such as cleaning up a spill or leak and cleaning or repairing contaminated equipment, must wear:

- Protective eye wear (goggles, face shield, or safety glasses)
- Coveralls over long-sleeve shirt and long pants
- Chemical-resistant gloves
- Chemical-resistant footwear plus socks
- Chemical-resistant apron if exposed to the concentrate
- Chemical-resistant headgear for overhead exposure
- A respirator with 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), or a NIOSH-approved respirator with an organic vapor (OV) cartridge or canister with any R, P, or HE prefilter. Please note that N designation for respirator filters does not apply when application is made with oils.

USER SAFETY REQUIREMENTS

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

ENGINEERING CONTROLS

- Mixers and loaders supporting aerial or mechanical ground applications must use a closed system designed by the manufacturer to enclose the pesticide to prevent it from contacting handler or other people *AND* the system must be functioning properly and must be used and maintained in accordance with the manufacturer's written operating instructions.
- The system must be capable of removing the pesticide from the shipping container and transferring it into mixing tanks and/or application equipment.
- At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage to not more than 2 mL per disconnect point.

In addition, mixers and loaders must:

- Wear the PPE required above for mixers and loaders
- Have immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown the PPE specified above for handlers engaged in those activities for which use of an engineering control is not possible
- If the system operates under pressure, protective eyewear must be worn

Applicators must:

- Use an enclosed cab/cockpit and must wear the PPE required in the PPE section of this labeling for applicators.
- Be provided and have immediately available for use in case of an emergency repair of the application equipment, the PPE specified in the PPE section of this labeling for handlers engaged in those activities for which use of an engineering control is not possible.
- Take off any PPE that was contaminated before entering reentering the cab/cockpit.
- Store all such PPE in a closed, chemical-resistant container, such as a plastic bag, to prevent contamination of the inside of the cab/cockpit.

In addition, motorized ground-equipment applicators must:

- Use an enclosed cab with a nonporous barrier that totally surrounds the occupant and prevents contact with pesticides outside the cab. The cab must either have a properly functioning ventilation system that is used and maintained according to the manufacturer's written operating instructions and is declared in writing by the manufacturer or by a governmental agency to provide at least as much protection as the type of respirator listed in the PPE section above or the occupant must wear a respirator as specified in the PPE section above.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE 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.

It is recommended that any worker displaying clinical signs of cholinesterase-inhibition, such as headaches, nausea, and dizziness have an immediate physical examination including appropriate cholinesterase measurements. If initial examination was not conducted by a board-certified person who is certified in occupational health, then a separate examination should be conducted within 24 hours by a person so certified.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and wildlife. Runoff from treated areas or deposition of spray droplets into a body of water may be hazardous to fish and aquatic invertebrates. Do not apply over bodies of water (e.g., lakes, swamps, rivers, permanent streams, natural ponds, commercial fish ponds, marshes or estuaries), except when necessary to target areas where adult mosquitoes are present, and weather conditions will facilitate movement of applied material away from the water in order to minimize incidental deposition into the water body. Do not contaminate bodies of water when disposing of equipment washwaters or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. To minimize hazard to bees, it is recommended that the product is not applied more than two hours after sunrise or two hours before sunset, limiting application to times when bees are least active. Do not apply this product or allow it to drift to blooming crops or weeds while bees are visiting the treatment area, except when applications are made to prevent or control a threat to public and/or animal health determined by a state, tribal or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or the tribe during a natural disaster recovery effort.

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DIRECTIONS FOR USE

Before making the first application of the season, consult with the primary State agency responsible for regulating the use of pesticides to determine if permits are required or regulatory mandates exist.

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, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

TANK MIXES

NOTICE: Tank mixing or use of this product with any other product shall be the exclusive risk of user, applicator and/or application advisor. Read and follow the entire label of each product to be used in the tank mix with this product.

TRUMPET EC is a special formulation for use undiluted to be applied for the control of mosquitoes, flies and certain other nuisance insects.

APPLICATION RESTRICTIONS

For application by, or under the supervision of, personnel certified/trained in public health pest control or mosquito control. For each application, a record must be kept of:

- Date, time and areas where application occurred
- Type and size of spray nozzle used
- Dilution and application rate
- Speed of application vehicle (whether air or ground)
- A description of insecticide delivery system used for the specific application
- Climate factors (e.g., ambient temperature, wind speed/direction) as determined using reliable means
- Employees involved in mixing, loading and applying TRUMPET EC

These records must be kept by the responsible public agency or their designee for a minimum of two years using storage methods that will allow the records to be easily retrieved.

Any system used to apply this product must be capable of providing the correct droplet size as specified below. Likewise, all applications must use the correct droplet size as specified below. Careful attention to directions concerning nozzles, nozzle positioning, air speed and droplet size is essential to avoid unwanted effects. Under-atomization produces large droplets that will quickly fall to the ground, while over-atomization produces finer droplets which either evaporate, dissipate, or drift in an unanticipated manner. Correct droplet size is critical to ensure effective mosquito control.

The entire spray system must be inspected before each operation to correct any leaks or obstructions, to detect whether the nozzle, hoses, or other parts are worn and need replacement, to ensure that the flow is properly calibrated and to determine that adequate pressure is being maintained. Adequate cleaning and maintenance of unit must be performed to ensure that the entire system is operating properly. Spray system components essential for correct droplet size must be cleaned or replaced as needed to ensure correct droplet size.

Spray during periods when wind speed is between 1 and 15 mph at ground level and when thermal activity is low. Do not apply when ambient temperature is less than 50°F.

Do not apply when it is raining in the treatment area.

Treatment of a site should be based on pest surveillance results. Do not treat any site more than 1 time per day. Do not treat any site with more than 2 fl. oz. of undiluted TRUMPET EC per acre within a 7 day period and the amount of undiluted TRUMPET EC applied to any site should not exceed 127 fl. oz. (10.73 pounds per acre of naled a.i./acre) per year. More frequent treatments may be made to prevent or control a threat to public and/or animal health determined by a state, tribal or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or tribe during a natural disaster recovery effort.

Ground-Based Application:

Spray equipment must be adjusted so that the volume median diameter (VMD) is less than 40 microns ($Dv\ 0.5 < 40\ \mu m$) and that 90% of the spray is contained in droplets smaller than 75 microns ($Dv\ 0.9 < 75\ \mu m$). Directions from the equipment manufacturer or vendor, pesticide registrant, or a test facility using a laser-based measurement instrument must be used to adjust equipment to produce acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rate(s) are properly calibrated.

Aerial Application:

Spray equipment must be adjusted so that the volume median diameter produced is less than 60 microns ($Dv\ 0.5 < 60\ \mu m$) and that 90% of the spray is contained in droplets smaller than 115 microns ($Dv\ 0.9 < 115\ \mu m$). The effects of flight speed and, for non-rotary nozzles, nozzle angle on the droplet size spectrum must be considered. Directions from the equipment manufacturer or vendor, pesticide registrant, or a test facility using a wind tunnel and laser-based measurement instrument must be used to adjust equipment to produce acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rate(s) are properly calibrated.

OPERATIONAL USE INSTRUCTIONS

- All equipment used in the mixing or application (by ground or air) of TRUMPET EC should be constructed of corrosion-resistant materials. Stainless steel, bronze, brass, fiberglass, polypropylene and rigid PVC have all proven to be adequately resistant to the effects of TRUMPET EC when properly maintained and inspected.
- Use of Teflon or Viton seals is recommended. Even when these materials are used to construct a spray system, a careful maintenance program involving flushing, cleansing and constant inspection must be followed. Avoid use of steel or galvanized steel.
- Strain TRUMPET EC as it is being loaded. Use a 100 mesh stainless steel or nylon screen. If product crystallization occurs, warm at 70°F until crystals disappear.
- Flushing the system following application is essential. Use water to thoroughly flush the entire spray system following application of TRUMPET EC.
- TRUMPET EC must be applied using the correct droplet size. Over-atomization produces finer droplets which either evaporate or dissipate too quickly and become unavailable for mosquito contact. The spread factor for TRUMPET EC on silicone or Teflon-coated slides is 0.54 and 0.7, respectively. If applied incorrectly, TRUMPET EC will spot certain automobile paint finishes. Careful attention to recommendations concerning nozzles, nozzle positioning, air speed and droplet size is essential to avoid paint spotting.

ADULT MOSQUITO CONTROL

Adult Mosquito Control in Residential Areas, Municipalities, Tidal Marshes, Swamps, Woodlands, and Agricultural Areas (when applied in wide-area public pest control programs sponsored by governmental entities): It is not necessary to avoid farm buildings, dairy barns, pastures, feed or forage areas. Use in agricultural areas should be in a manner as to ensure that residues do not exceed the established federal tolerance for the active ingredient in or on raw agricultural commodities resulting from use for wide area pest control. Treat shrubbery and vegetation where mosquitoes may be present. Shrubby and vegetation around stagnant pools, marshy areas, swamps, residential areas, municipalities, woodlands, pastures, farm buildings and feedlots may be treated.

Ultra Low Volume (ULV) Aerial Application: Apply 0.6 to 1.2 fl. oz. of undiluted product per acre (equivalent to 0.05 to 0.1 lb. a.i./acre). Use the 1.2 fl. oz. rate where heavy vegetation exists; i.e., woodlands, etc.

Ultra Low Volume (ULV) Ground Application: Apply TRUMPET EC undiluted at a rate of 0.75 fl. oz. per minute at 5 mph; 1.5 fl. oz. per minute at 10 mph; and 2.2 fl. oz. per minute at 15 mph, applying a 300 ft. swath. These flow rates are equivalent to 0.02 lb. active per acre. In conditions of high pest pressure and/or heavy foliage, a maximum of 0.1 lb. active per acre may be applied.

Vehicles used to apply TRUMPET EC must be kept closed during application (air-conditioned) and equipped with an automatic flow control device. Consult equipment manufacturers for specific recommendations.

HOUSEFLIES, GNATS, CERTAIN OTHER NUISANCE INSECTS AND SUPPRESSION OF BLACKFLIES

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Small Flying Moths, Flies (including but not limited to Crane Flies, Adult Stable Flies, Dog Flies, Biting Flies, Filth Flies), Midges in Residential Areas, Municipalities, Tidal Marshes, Swamps, Woodlands, and Agricultural Areas (when applied in wide-area public pest control programs sponsored by governmental entities): It is not necessary to avoid farm buildings, dairy barns, and feed or forage areas.

Ultra Low Volume (ULV) Aerial Application: Apply 1.2 fl. oz. of undiluted TRUMPET EC per acre (equivalent to 0.1 lb. a.i./acre).

SUPPRESSION OF DEER FLIES AND OTHER TABINIDS

Deer Flies in Residential Areas, Municipalities, Tidal Marshes, Swamps, Woodlands, and Agricultural Areas (when applied in wide-area public pest control programs sponsored by governmental entities): It is not necessary to avoid farm buildings, dairy barns, and feed or forage areas.

Ultra Low Volume (ULV) Aerial Application: Apply 1.2 fl. oz. of undiluted TRUMPET EC per acre (equivalent to 0.1 lb. a.i./acre).

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

STORAGE: Keep pesticides in original container. Do not put concentrate into, or dilute into food or drink containers. For help with any spill, leak, fire or exposure involving this material, call day or night 1-323-264-3910.

PESTICIDE DISPOSAL: This product is 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 REUSE:

RETURNABLE CONTAINER: This container is a dedicated, single-product returnable container. Return empty container to seller at location designated by seller as a collection point. Do not break seals, add anything to container or open container after use. Do not rinse or contaminate empty container. Do not dispose of untampered empty container or use it for any other purposes. Any evidence of broken seals or other tampering or adding anything to the container renders it unfit for return. In such case, it is the obligation of the holder of the container to dispose of it properly.

It is required that this product be used in a **CLOSED SYSTEM**. This container may require a tank adapter. For questions regarding tank adapters, call AMVAC Customer Service at 1-888-462-6822 (1-888-GO-AMVAC).

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.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES,

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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.

Trumpet® is a registered trademark of Amvac Chemical Corporation.

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