

5481-492

1/19/2001

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

JAN 19 2001

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Jon C. Wood  
Regulatory Manager  
Amvac Chemical Corporation  
4695 MacArthur Court, Suite 1250  
Newport Beach, CA 92660

Subject: Amendment - Update First Aid Statements  
Fortress Technical  
EPA Reg. No. 5481-492  
Your submission dated September 29, 2000

Dear Mr. Wood:

The amendment referred to above, submitted in connection with registration under section 3 (c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below.

1. Revise your "Precautionary Statements" section to read: "Fatal if swallowed, inhaled, or absorbed through the skin. Corrosive. Causes irreversible eye damage. Wear protective eyewear (goggles, face shield or safety glasses). Wear protective clothing and gloves. (Coveralls worn over long-sleeved shirt and long pants, socks, chemical resistant footwear and chemical resistant gloves). Do not breathe vapor. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, and using tobacco. Remove contaminated clothing and wash before reuse. For handling activities, use either a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix 14G)." Revise the language in your "Precautions in Using" section to reflect these changes.
2. Under your "Environmental Hazards" section, please add the following statement "Do not contaminate water when cleaning equipment or when disposing of equipment washwaters."
3. Please clarify what you have determined to be a "protective suit" as described in your "Precautions in Using" section. Are these the coveralls described in the revised "Precautionary Statements" section listed above? Please explain.

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4. Submit two (2) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the label is enclosed for your records. If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,

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

Enclosure

cc: Deanna Scher, SRRD

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# AMVAC Fortress<sup>®</sup> Technical

## FOR FORMULATION USE ONLY

Active Ingredient	By Weight
Chlorethoxyfos: Phosphorothioic acid, O,O-diethyl O-(1,2,2,2-tetrachloroethyl) ester	88%
<b>Inert Ingredients</b>	12%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

DANGER



PELIGRO

POISON

PRECAUCION AL USUARIO: Si usted no les ingles, no used este producto hasta quela etiqueta haya sido explicado ampliamente.

### FIRST AID

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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

JAN 19 2001

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

5481-492

### Emergency Telephone Number

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.

### Note to Physician

This product is an organophosphate insecticide. ATROPINE IS THE EMERGENCY ANTIDOTE FOR FORTRESS INSECTICIDE POISONING. 2-PAM is also antidotal and may be used in conjunction with atropine. CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING.

### Warning Symptoms

FORTRESS is an organophosphate insecticide and is a cholinesterase inhibitor. Overexposure to this product may cause toxic signs and symptoms due to stimulation of the cholinergic nervous system. Symptoms of poisoning may include weakness, headache, tightness in chest, blurred vision, non-reactive pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea, muscle tremors and abdominal cramps. In severe cases, convulsions, unconsciousness and respiratory failure may occur.

### Treatment

Atropine is the specific therapeutic antagonist of choice against this type of parasympathetic nervous stimulation. If warning symptoms appear, treatment should consist of parenteral atropine sulfate. This can be administered intramuscularly every 10 minutes until full atropinization (as indicated by dilated pupils, dry flushed skin and tachycardia) has been achieved and repeated thereafter whenever symptoms reappear. For infants and children, the dose of atropine sulfate is 0.05 mg/kg. For adults, 1 to 2 milligrams will be required for mild cases, but up to 4 mg may be needed for severe intoxication. 20 to 30 milligrams or more may be required during the first 24 hours.

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 30-minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5 percent 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 20 - 50 mg/kg. 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. For medical emergencies involving this product, call 1-323-264-3910.

EPA REG. NO. 5481-492

EPA EST. NO. 34704-CO-1

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

**DANGER**  **PELIGRO**  
**POISON**

**MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN. DO NOT BREATHE VAPOR. DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING.**

**PRECAUTIONS IN USING**

**HANDLE THIS PRODUCT ONLY WHILE WEARING THE FOLLOWING PROTECTIVE CLOTHING AND EQUIPMENT:** Wear a protective suit that covers all parts of the body except the head, hands, and feet; wear chemical-resistant gloves, chemical-resistant apron, and chemical-resistant shoes or shoe coverings; wear goggles or a face shield; wear a pesticide respirator approved by Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health when transferring equipment or handling the product. Wash thoroughly with soap and water after handling and before eating or drinking. Remove contaminated clothing and wash before reuse. Chemical-resistant gloves, apron, shoes or shoe coverings should be washed with soap and water after each use. Do not use the same gloves for other uses. Destroy and replace gloves frequently. Repeated exposure can lead to an asymptomatic increase in the susceptibility to poisoning. Avoid prolonged exposure to this product. In case of accidental contact, immediately remove contaminated clothing and wash affected skin with soap and hot water. Launder clothing and decontaminate before reuse. Wash legs, arms and hands thoroughly with soap and hot water before eating, drinking or smoking. Bathe or shower at the end of the workday and change into freshly laundered clothing.

**Environmental Hazards**

This pesticide is toxic to birds, fish, and other wildlife. Do not discharge effluent into lakes, streams, ponds, or public waters unless in accordance with an NPDES permit. Do not discharge effluent into sewer systems without previously notifying sewage treatment plant authorities. For guidance, contact your regional office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

**Only for formulation into an insecticide.**

For the following uses:

1. Terrestrial Food Crops:  
Corn, field (forage, grain, fodder), pop (grain, fodder), sweet (forage, fodder), and seed
2. Uses for which USEPA has accepted the required data that the formulator has submitted in support of registration.
3. Uses for experimental purposes that are in compliance with USEPA requirements

Formulators using this product are responsible for obtaining EPA registration of the formulated product.

**STORAGE AND DISPOSAL**

**STORE PRODUCT IN ORIGINAL CONTAINER ONLY.** Do not contaminate water, other pesticides, fertilizer, food or feed by storage or disposal.

**STORAGE:** Store in a secure, locked, dry and temperate area where children, unauthorized persons or animals cannot enter. Store in original container. Keep the container closed when not in use. Do not transport or store near food or feed intended for human or animal consumption.

**PRODUCT DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide or container is a violation of Federal Law. Contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures. In case of significant spill, call CHEMTREC at 1-800-424-9300.

**LIMITED WARRANTY AND DISCLAIMER**

The manufacturer warrants (a) that this product conform 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.**

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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.

Fortress® is a registered trademark of AMVAC Chemical Corporation.

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