

MAY 13 1991

R. Handy, Ph.D.
Great Lakes Chemical Corporation
Highway 52 NW.
P.O. Box 2200
West Lafayette, IN 47906

Dear Dr. Handy:


Subject: 98-2
EPA Registration No. 5785-56 (RPH-91-004)
Your Letter Dated January 4, 1991

This is in response to your letter to add two additional suppliers of the active ingredient, chloropicrin, to the revised Confidential Statement of Formula. The following comments apply.

- The alternate sources of supply for the active ingredient, chloropicrin, and the revised Confidential Statement of Formula agree with the label and are acceptable.

If you have any questions about these comments, please call Marianne Clark at (703) 557-3964.

Sincerely yours,



Walter C. Francis
Product Manager (32)
Antimicrobial Program Branch
Registration Division (H7505C)

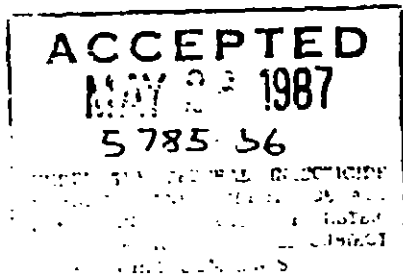
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CONCURRENCES

SYMBOL	SURNAME	DATE					

98-2

**A Nematicide, Insecticide, Herbicide for Formulation
or Repackaging Into End-Use Products**
Intended for Terrestrial, Greenhouse, Domestic Garden and Indoor
Non-Food Uses Only



Active Ingredient: Methyl Bromide 98%
Inert Ingredients: Chloropicrin 2%

DANGER

POISON

EPA REG. NO. 5785-56-AA

EPA EST. NO. 5785-AR-01

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS

Extremely hazardous liquid and vapor under pressure. Do not breathe vapor. Inhalation may be fatal or cause serious acute illness or delayed lung or nervous system injury. Liquid or excessive vapor may cause serious skin or eye injury which may have a delayed onset. Do not get liquid on skin, in eyes or on clothing.

This product contains chloropicrin as a warning agent. Chloropicrin may be irritating to the upper respiratory tract, and even at low levels can cause painful irritation to the eyes, producing watering. If these symptoms occur, leave the area immediately.

Capitalize the circled items.

STATEMENT OF PRACTICAL TREATMENT. In all cases of overexposure, get medical attention immediately. Take person to a doctor or emergency treatment facility. If inhaled, remove exposed person from contaminated area. Keep warm. Make sure person can breathe freely. If breathing has stopped, apply artificial respiration. If not unconscious, rinse mouth out with water. In case of skin contact, immediately remove contaminated clothing, shoes, and any other item on skin. Wash contaminated skin area thoroughly with soap and water. If in eyes, hold eyelids open and flush with a steady, gentle stream of water for at least 15 minutes.

- Add "Do not give anything by mouth to an unconscious person."

NOTE TO PHYSICIAN. Early symptoms of overexposure are dizziness, headache, nausea and vomiting, weakness and collapse. Lung edema may develop in 2 to 48 hours after exposure, accompanied by cardiac irregularities; these effects are the usual cause of death. Repeated overexposures can result in blurred vision, staggering gait and mental imbalance, with probably recovery after a period of no exposure. Blood bromide levels suggest the occurrence, but not the degree, of exposure. Treatment is symptomatic.

PHYSICAL AND CHEMICAL HAZARDS. Contents under pressure. Do not use or store near heat or open flame. In fires fueled by other materials, Methyl Bromide may liberate hazardous gases. The use of Methyl Bromide with aluminum, magnesium, zinc and alkali metals will result in the liberation of toxic gases, and possible fire and explosion. In addition, severe corrosion of containers and equipment made of these metals will occur.

PROTECTIVE CLOTHING. Methyl bromide may be trapped inside clothing and cause skin injury. Wear loose, long sleeved shirts, long trousers and socks that are cleaned after each wearing. Do not wear jewelry, gloves or other gas confining apparel. If full-face respiratory protection is not required, wear full face shield for eye protection when handling liquid. Do not reuse contaminated clothing until thoroughly cleaned and shoes until aerated. Add "After application immediately remove clothing, shoes and socks." and "Drenched clothing cannot be adequately decontaminated."

ENVIRONMENTAL HAZARDS. This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

SPILL AND LEAK PROCEDURES. In case of a rupture of hose or fitting, immediately evacuate area of spill or leak. Use a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air-supplied/SCBA respirator for entry into affected area to correct problem. Approach from upwind to make necessary repairs. Do not reenter area without respiratory protection until a spill has evaporated or a leak has been repaired, and the methyl bromide concentration is determined to be less than 5 ppm.

Contaminated soil, water, and other cleanup debris is a toxic hazardous waste. Report spill to the National Response Center (800-424-8802) if the reportable quantity of 1000 pounds is exceeded.

DIRECTIONS FOR USE. It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

98-2 may be used only for repackaging or formulating into an economic poison. Registration by the U.S. Environmental Protection Agency is required before the new product can be lawfully distributed in interstate commerce.

STORAGE AND DISPOSAL. Store in a locked, well-ventilated area. Post as a pesticide storage area. Return empty containers to the Great Lakes Chemical Corporation location from which shipment was made. Return partial containers only after consulting Great Lakes Chemical Corporation for proper shipping instructions.

The storage and disposal statements are in italics. Refer to pages 47 and 96-98 of the Methyl Bromide Registration Standard for appropriate language.



STATEMENT OF WARRANTY AND LIABILITY

Seller warrants that this product complies with the specifications expressed in this label. SELLER MAKES NO OTHER WARRANTIES; AND DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO WARRANTIES OF MERCHANTABILITY AND FITNESS FOR THE INTENDED PURPOSE. Seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. Seller shall have no liability for consequential damages.

Many pesticidal chemicals are poisonous and may leave a toxic residue on the plants to which they are applied. The U.S. Environmental Protection Agency has established maximum amounts of such pesticidal chemicals that may remain on raw agricultural products at harvest, and it is the user's responsibility to see that there is no residue on such crops at harvest in excess of these amounts. The "Directions for Use" are based on the best available information, and if followed carefully should not leave excessive residues at harvest. However, Great Lakes Chemical Corporation assumes no responsibility as to their accuracy nor for any loss due to excessive residues.