

P. ... # 51 ... 1/10

27 FEB 1989

655 240,050  
18 1  
655 231,149 ?  
38

Helena Chemical Company  
5100 Poplar Avenue, Suite 3508  
Memphis, TN 38137

Gentlemen:

Subject: Helena Phosdrin 2E  
EPA Registration No. 5905-298  
Your Amended Application Dated August 18, 1988  
Your Letter Dated November 17, 1988

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below.

1. Add asterisks (\*) after the percentage of alpha isomer and Related Compounds.
2. Immediately below "Total 100.0%" put "\*\*Equivalent to 35.4%/w Mevinphos Insecticide."
3. In the Storage and Disposal statement, change "CAUTION" to "DANGER."

Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

The following comments refer to your 90-Day Response to the Registration Standard:

1. Summary Sheet: Not applicable.
2. Formulator's Exemption: Acceptable

53967:I:Peacock:CBI-07:KENCC:02/17/89:03/31/89:CL:VO:SG:CL

CONCURRENCES

SYMBOL	BURNAME	DATE						

3. Confidential Statement of Formula - Submit a revised CSP, giving us the chemical identity of the last two ingredients in your formula. Also, check the upper and lower limits for the active ingredients. Contact your supplier for assistance.

Sincerely yours,



William H. Miller  
Product Manager (16)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

Enclosures

REGISTERED  
WITH COMMENTS  
in EPA Letter Dated:

FEB 27 1989

**RESTRICTED USE PESTICIDE**  
Due to Very High Acute Toxicity to Humans  
and  
Residue Effects on Avian, Mammalian and  
Aquatic Species

Under the Federal Insecticide,  
Fungicide and Rodenticide Act  
amended for the pesticide  
registered under EPA Reg. 272.

5905-298

For retail sale to and use only by certified applicator or persons under their direct supervision and only for those uses covered by the certified applicator's certification. Direct supervision for this product is defined as the certified applicator being physically present during application, mixing, loading, repair and cleaning of application equipment. Certified applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

HELENA

PHOSDRIN 2-E

An Emulsifiable Liquid

For use in Water as an Agricultural Insecticide Spray!

ACTIVE INGREDIENTS:	BY WEIGHT
Mevinphos (2-Carbomethoxy-1-Methylvinyl Dimethyl Phosphate, alpha isomer .....	15.25%
Related compounds .....	10.14%
INERT INGREDIENTS .....	74.60%
TOTAL .....	100.00%

(Contains 2 lb. Phosdrin per gallon)

POISON



DANGER  
Keep Out of  
Reach of  
Children

PELIGRO

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado ampliamente.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.  
IF INHALED: Remove patient from contaminated atmosphere.  
IF ON SKIN: In case of contact, remove contaminated clothing and immediately wash skin thoroughly with soap and water.  
IF IN EYES: In case of contact, flush immediately with soap and water for at least 15 minutes.

EPA EST. NO.  
EPA REG. NO. 5905-298

NET CONTENTS

Manufactured by  
HELENA CHEMICAL COMPANY  
MEMPHIS, TN. 38137

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

**DANGER!** POISONOUS IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN. RAPIDLY ABSORBED THROUGH SKIN. REPEATED INHALATION OR SKIN CONTACT MAY, WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE SUSCEPTIBILITY TO PHOSDRIN INSECTICIDE POISONING. DO NOT SWALLOW OR GET IN EYES, ON SKIN, OR ON CLOTHING. DO NOT BREATHE VAPORS. DO NOT CONTAMINATE FOOD OR FEED PRODUCTS. KEEP AWAY FROM HEAT OR OPEN FLAME.

### NOTE TO PHYSICIAN

**WARNING SYMPTOMS:** Symptoms include weakness, headaches, tightness in chest, blurred vision, nonreactive pinpoint 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.

Praldoxime 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 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.

### ENVIRONMENTAL HAZARDS

"This pesticide is toxic to fish and wildlife. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters."

"This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area."

### Physical and Chemical Hazards

DO NOT USE, POUR, SPILL OR STORE NEAR HEAT OR OPEN FLAME

# DIRECTIONS FOR USE

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

## RE-ENTRY STATEMENT

"Reentry into treated citrus groves, grape vineyards, and nectarine and peach orchards is prohibited for 96 hours (4 days) after the end of application, unless the protective clothing specified on this label for early reentry is worn. Reentry into all other treated areas is prohibited for 48 hours (2 days) after the end of application, unless the protective clothing specified on this label for early reentry is worn.

FOR EARLY REENTRY INTO TREATED AREAS BEFORE SPRAYS HAVE DRIED, wear all protective clothing specified on this label for an applicator.

FOR EARLY REENTRY INTO TREATED AREAS AFTER SPRAYS HAVE DRIED, wear 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).

Written or oral warnings must be given to workers who are expected to be in treated areas or in an area about to be treated with this product. (Indicate specific oral warnings which inform workers of areas or fields that may not be entered without specific protective clothing, period of time field must be vacated and appropriate actions to take in case of accidental exposure.) When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: **DANGER: Area treated with MEVINPHOS on (Date)**

**Do not enter without appropriate protective clothing until (insert date/time reflecting end of reentry interval set forth on this label). In case of accidental exposure see STATEMENTS OF PRACTICAL TREATMENT found on the MEVINPHOS product label."**

**CHEMIGATION PROHIBITION:**

Do not apply this product through any type of irrigation system.

**WORK SAFETY PRECAUTIONS:**

USE ONLY WHEN WEARING THE FOLLOWING PERSONAL PROTECTIVE EQUIPMENT DURING MIXING/LOADING, APPLICATION, REPAIR AND CLEANING OF MIXING, LOADING, AND APPLICATION EQUIPMENT, AND DISPOSAL OF THE PESTICIDE: protective suit of one or two pieces that covers 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); goggles or face shield; hood or wide brimmed hat; NIOSH or MSHA approved respiratory protection device.

IF MIXING/LOADING IS PERFORMED USING A CLOSED SYSTEM, THE FOLLOWING PROTECTIVE CLOTHING AND EQUIPMENT MAY BE WORN AS AN ALTERNATIVE: Long-sleeve shirt; long-legged pants; chemical-resistant gloves; chemical-resistant apron; shoes and socks. Goggles or face shield must be worn when the system is under pressure. All other protective clothing and equipment required for use with open systems must be available nearby.

IF APPLICATION IS PERFORMED USING AN ENCLOSED CAB OR COCKPIT, THE FOLLOWING PROTECTIVE CLOTHING AND EQUIPMENT MAY BE WORN AS AN ALTERNATIVE: Long-sleeve shirt and long-legged pants; shoes and socks. Chemical-resistant gloves must be available in the cab or cockpit and must be worn during entry to and exit from the application vehicle. All other protective clothing and equipment required for use during application must be available in the cab and must be worn when exiting the cab into treated area. When used for this purpose, contaminated clothing may not be brought back into the cab unless in an enclosure such as a plastic bag. **REMEMBER - THIS CLOTHING IS INADEQUATE TO PROTECT YOU DURING REPAIR AND CLEANING OF APPLICATION EQUIPMENT AND EARLY REENTRY TO TREATED AREAS! REFER TO PROTECTIVE CLOTHING AND EQUIPMENT REQUIREMENTS ABOVE.**

**IMPORTANT!** If pesticide comes in contact with skin, wash off with soap and water and contact a physician immediately. Always wash hands, face, and arms with soap and water before smoking, eating, drinking, or toileting.

**AFTER WORK:** Before removing gloves, wash them with soap and water. Take off all work clothes and shoes. Shower using soap and water. Wear only clean clothes when leaving job -- do not wear contaminated clothing. Personal and protective clothing worn during work must be stored and laundered separately from household articles. Clean or launder protective clothing after each use. Respirators must be cleaned and filters replaced according to instructions included with the respirators. Protective clothing and protective equipment that be comes heavily contaminated or drenched with mevinphos must be destroyed according to State and local regulations. **HEAVILY CONTAMINATED OR DRENCHED CLOTHING CANNOT BE ADEQUATELY DECONTAMINATED.**

The National Pesticide Telecommunication Network is available for recommendations regarding poisoning management, emergency treatment, and other information regarding the toxicity of mevinphos. The toll free number for the National Pesticide Telecommunication Network is 1-800-858-7378.

**IF HANDLED INDOORS** provide mechanical exhaust ventilation. Keep all unprotected persons, children, livestock, and pets away from treated area or where there is danger of drift. Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help right away, see the First Aid (Practical Treatment) section of this label."

**"HUMAN FLAGGERS ARE PROHIBITED** during aerial application of this product unless in totally enclosed vehicles."

## **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. Do not reuse empty container. Open dumping is prohibited.

**STORAGE:** Do not store in or around the home. Store in a secure, dry and temperate area. Store in original container only. Product is flammable. Keep away from heat, sparks or open flame. If spilled avoid exposure. If significant spill call CHEMTREC (800) 424-9300. Spill can be contained by covering with a sufficient amount of absorbent material, such as clay, diatomaceous earth, sand, sawdust or sweeping compound. Place in drum, label contents and dispose of according to the instructions below in pesticide disposal.

**CAUTION:** Wear a pesticide respirator and avoid forming dust clouds during clean-up.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinse water is a violation of Federal law. If the wastes cannot be disposed of 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:** 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.



## RECOMMENDATIONS

Application should be made only by trained personnel using approved protective equipment. Dosages given refer to pints of Phosdrin 2-E in 50 to 100 gallons of water to uniformly and thoroughly cover one acre for ground applications only.

**CELERY, CANTALOUPE, WATERMELON, CARROTS** — Use  $\frac{1}{2}$  to 1 pint per acre for control of Aphids. Use 1 to 2 pints per acre for control of Cabbage Loopers, Mites, Leafhoppers, Salt-marsh Caterpillars, Lygus Bugs, and Dipterous Leaf Miners (adults). Do not apply within 3 days of harvest on celery; within 1 day of harvest on Cantaloupes, Watermelons, and Carrots.

**MUSTARD GREENS, BRUSSELS SPROUTS, CAULIFLOWER, COLLARDS, KALE, SPINACH** — Use  $\frac{1}{2}$  to 1 pint per acre for control of Aphids. Use 1 to 2 pints per acre for control of Cabbage Loopers, Imported Cabbageworms, Grasshoppers, Leafhoppers, Mites, Cutworms (climbing), Lygus Bugs, Dipterous Leaf Miners (adults). Do not apply within 3 days of harvest on these crops, except Spinach. Do not apply within 4 days of harvest on spinach.

**BROCCOLI, CABBAGE, EGGPLANT, PEPPERS** — Use  $\frac{1}{2}$  to 1 pint per acre for control of Aphids. Use 1 to 2 pints per acre for control of Cabbage Loopers, Imported Cabbageworms, Grasshoppers, Leafhoppers, Mites, Cutworms (climbing), Dipterous Leaf Miners (adults), and Lygus Bugs. Do not apply within 1 day of harvest.

If aircraft application is intended approximately 1 to 3 gallons minimum of water per acre consistent with crop growth and good coverage, must be used.

CONDITIONS OF SALE - LIMITED WARRANTY  
AND LIMITATIONS OF LIABILITY AND REMEDIES

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions, the failure to follow the label directions, or good application practices, all of which are beyond the control of Helena or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. Helena warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of Helena. Helena makes no other warranties or representations of any kind, express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warrant shall be implied by law.

The exclusive remedy against Helena for any cause of action relating to the handling or use of this product is a claim for damage and in no event shall damages or any other recovery of any kind against Helena exceed the price of the product which causes the alleged loss, damage, injury, or other claim. Helena shall not be liable and any and all claims against Helena are waived, for special, indirect, incidental, or consequential damages or expense, of any nature, including, but not limited to, loss of profits or income, whether or not based on Helena's negligence, breach of warranty, strict liability in tort or any other cause of action.

Helena and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.