

PM 14

5905-298

File

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

MAR 3 - 1994

Beverly Neale  
HELENA CHEMICAL CO.  
6075 POPULAR AVE SUITE 500  
MEMPHIS, TN 38119

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 09/07/93 in Response to PR Notice 93-7  
EPA Reg. No. 5905-298  
HELENA PHOSDRIN 2-E

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.

**BEST AVAILABLE COPY**



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

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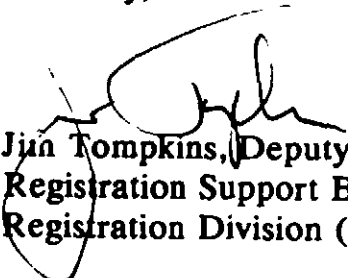
Submit the final printed labeling via the U.S. Postal Service to:

**Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001**

Hand or courier deliveries of final printed labeling may be made to:

**Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202**

Sincerely,

  
**Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)**

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Beverley Neale  
HELENA CHEMICAL CO  
6075 POPLAR AVE SUITE 500  
MEMPHIS TN 38119

Comment for: EPA Reg Nr.5905-298  
HELENA PHOSDRIN 2-E

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Add the following statement to the "Personal Protective Equipment" section on your proposed labeling immediately following the statements requiring a closed system and enclosed cabs: "The closed systems and enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40CFR 170.240(d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS." The exact location is shown in Section A on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

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

For Retail sale to and use only be 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.

**PHOSDRIN 2-E**  
**AN EMULSIFIABLE LIQUID**  
**FOR USE IN WATER AS AN AGRICULTURAL INSECTICIDE SPRAY!**

**ACTIVE INGREDIENTS:**

Mevinphos (2-Carbomethoxy-1-Methylvinyl  
Dimethyl Phosphate, alpha isomer ..... 15.26%\*  
Related Compounds ..... 10.14%\*

**INERT INGREDIENTS:** ..... 74.60%  
**TOTAL** ..... 100.00%

\*Equivalent to 35.4%/w Mevinphos Insecticide.

Contains 2 lbs. Phosdrin per gallon

Contains Petroleum Distillates

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 5905-298  
3 1994

ACCEPTED  
with COMMENTS  
by EPA Label Panel

**KEEP OUT OF REACH OF CHILDREN**  
**POISON - DANGER**

(skull and crossbones)

**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.)

**STATEMENT OF PRACTICAL TREATMENT**

**Organophosphate**

**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 REG. NO.: 5905-298

EPA EST. NO.:

NET CONTENTS:

**MANUFACTURED BY**  
**HELENA CHEMICAL COMPANY**  
**MEMPHIS, TN 38119**

**BEST AVAILABLE COPY**

## 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, non-reactive 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 or 2 milligrams, until complete atropinization has occurred.

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 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.

### PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category G on an EPA chemical resistance category selection chart.

#### Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves, such as Barrier Laminate or Viton.
- Chemical-resistant footwear plus socks
- Protective Eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing or loading
- A respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with

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this product's concentrate. Do not re-use them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

### **USER SAFETY RECOMMENDATIONS**

Users should:

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

### **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 CHEMICALS HAZARDS**

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

### **CHEMIGATION PROHIBITION**

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

### **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### **AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

Each 48 hour REI is increased to 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate or Viton.
- Chemical-resistant footwear plus socks
- Protective Eyewear
- Chemical-resistant headgear for overhead exposure

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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. 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.

*Move to either above or below the engineering control, statements*

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.

**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

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 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 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 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.



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**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.