

PM 04

8241-10

10/28/99

pg 185

October 28, 1999

certified Mail (P-060 - 147-569)

Plant Products Corp.  
P.O. Box 1149  
Vero Beach, FL 82961

366 5-570583  
18

Attention: Mary AnnChesser

Subject: Plantfume 103 Smoke Generator  
- EPA Registration No. 8241-10  
Your amended application of October 8, 1999  
Sulfotepp Reregistration Eligibility Decision Document (September 1999) and  
Memorandum of Agreement of September 30, 1999

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling with the following changes before you release the product for shipment:

A. Can Label

1. Make sure no text is less than 6 points.
2. On Front Panel under "DANGER", change referral statement to:

REFER TO SUPPLEMENTAL LABEL FOR ADDITIONAL PRECAUTIONARY  
STATEMENTS, INCLUDING EARLY ENTRY PPE STATEMENTS.

B. Supplemental Label

1. At the bottom of Page 1 (last sentence), add "initial" before "ventilation".
2. Add this sentence at the bottom of Page 2:

Use of this product after September 30, 2004, is prohibited.

3. On Page 2, in "AGRICULTURAL USE REQUIREMENTS", add the heading "Initial Ventitation Criteria" before 1<sup>st</sup> paragraph and add the heading "Secondary Ventitation Criteria" before the 2nd paragraph.

4. In the "Application Directions", Item 1 must be:

All entries to the structure must be posted with the required fumigant warning signs.

5. Modify Item 3 to read:

A certified applicator wearing maximum PPE must perform the remaining tasks.

6. Delete the first two sentences in the section on **Personal Protective Equipment** and insert:

**"Personal Protective Equipment:** Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber  $\geq 14$  mils, nitrile rubber  $\geq 14$  mils, neoprene rubber  $\geq 14$  mils, natural rubber  $\geq 14$  mils, polyethylene, polyvinyl chloride  $\geq$  mils, and viton  $\geq 14$  mils."

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. 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.

Sincerely,



Daniel B. Peacock, Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7504C)

Enclosures: 1. Stamped Label  
2. A-79 Enclosure

10-12-13

Due to very high dermal and inhalation toxicity to humans

Puncture here



**ENVIRONMENTAL HAZARDS**

This pesticide is highly toxic to aquatic invertebrates and will kill or injure many species of fish if killed. Snapping and other aquatic organisms may be killed and some mammals may be injured if ingested. Do not contaminate water by cleaning of equipment or disposal of excess material. Do not wash containers.

**PHYSICAL AND CHEMICAL HAZARDS**

Do not use or store near heat or open flame. Keep away from children and animals.

**DIRECTIONS FOR USE:** This is a violation of Federal law if this container is used for any purpose other than that for which it was designed and labeled.  
Do not apply this product in a way that will injure people, animals, or property, or cause damage to crops, plants, or trees through drift. Only authorized handlers may use this product and must follow the label directions and all applicable regulations. For more information, contact the agency responsible for pesticide regulation in your State or Tribe.

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard. REFER TO ATTACHED SUPPLEMENTAL LABELING FOR WORKER PROTECTION STATEMENT, USE DIRECTIONS, AND RE-ENTRY STATEMENT

Entry Restrictions

Entry by any person or other Party may be limited or restricted in the way, location and WPS covered area. PROHIBITED, or otherwise possible, entry into the WPS covered area and one of the WPS verbiage under this heading. The WPS verbiage is hereby agreed to by the user and application is complete, for which no other action is required.

SEE SUPPLEMENTAL LABEL FOR EARLY ENTRY PPE STATEMENTS

[illegible]

**PLANTFUME 103™**  
**Smoke Generator**  
Contains Sulfatepp  
Organophosphate

ACTIVE INGREDIENT:	
O, O, O, O-Tetraethyl Dithiopyrophosphate	15%
INERT INGREDIENTS:	85%
TOTAL	100%

FOR USE IN COMMERCIAL GREENHOUSES  
ON ORNAMENTALS ONLY

REPORT OF REACTION OF CHLORINE

[illegible][illegible]

POISON

**DO NOT USE UNTIL AFTER READING SUPPLEMENTARY INSTRUCTION SHEET**

## STORAGE AND DISPOSAL

**PROHIBITIONS:** Do not paraphrase, alter, copy, or use a portion of a source. Do not store information in a manner which might otherwise allow the information to be used in a manner not intended.

**STORAGE:** Store in a cool, dry place at room temperature (68°-77°F). Store only in original container in a dry place, inaccessible to children and pets and away from direct sunlight. Topiramate may be up to 20% more in a dry place.

**CONTAINER DISPOSAL:** Inform the manufacturer that offers recycling or other alternative disposal methods. Inform the manufacturer of the following: other products approved by state and local authorities.

## WARRANTY STATEMENT

WARRANTY OF SATISFACTION. This product conforms to the chemical description on the label and is intended for the purposes stated thereon. It is not a substitute for a pesticide with specific instructions of use. This warranty does not extend to the use of this product in violation of the label instructions or under abnormal conditions or under conditions not reasonably foreseeable to Sytek and Bayer and Bayer assumes the risk of any such use. Sytek disclaims all other warranties, expressed or implied, including any warranty of fitness or merchantability. Sytek shall not be liable for consequential or indirect damages, resulting from the use or handling of the product, but Sytek's liability and Bayer's and Dow's exclusive remedy, shall be limited to the refund of the purchase price.

1.  $\mathbb{R}^n$  is a topological space with the standard topology.

Net Weight  
7 oz.

Treats  
20,000 cu. ft.

# PLANT PRODUCTS CORPORATION

P.O. Box 1149  
Vero Beach, FL 32961

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

OCT 28 1999

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 824-11

CAN  
LABEL

# Plant Products Corporation

P.O. Box 1149 \* 5051 41<sup>st</sup> Street  
Vero Beach, FL 32961  
561-567-7035 \* Fax: 561-567-2184

## SUPPLEMENTAL LABELING FOR PLANTFUME 103 SMOKE GENERATOR EPA REGISTRATION NO. 8241-10

See basic product labeling for complete information about ingredients, restriction, precautionary statements, and storage and disposal.

### RESTRICTED USE PESTICIDE

For retail sale to and use only by certified applicators and only for those uses covered by the applicator's certification. Use by non-certified applicators, even those under the direct supervision of a certified applicator is prohibited.

### WORKER PROTECTION STATEMENT

Precautionary Statements: Hazards to Humans and Domestic Animals

**Personal Protective Equipment:** Some materials that are chemical-resistant to this product are listed below. If you want more options, see the instructions for category G on an EPA chemical resistance category selection chart. Applicators and other handlers must wear:

- Long-sleeved shirt & long pants
- Shoes plus socks
- Chemical-resistant gloves
- NIOSH-approved air-supplying respirator that is one of the following types:
  - a supplied-air respirator (MSHA/NIOSH approved number prefix TC-19C) or
  - a self-contained breathing apparatus (SCBA) (MSHA/NIOSH approval number prefix TC-13F).

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

OCT 28 1999

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
reg. no. 8241-10.

**EXCEPTION:** Handlers are permitted to wear a NIOSH-approved organic-vapor-removing respirator (see types below) instead of an air-supplying respirator provided they meet one of the following criteria: (1) the handler will ignite five or fewer canisters and will be in the greenhouse for less than 10 consecutive minutes starting when the first canister is ignited OR (2) the handler will enter the treated greenhouse to operate ventilation equipment after application is complete (smoke is no longer being generated) but before full ventilation has taken place and will remain in the treated greenhouse for less than 10 consecutive minutes.

The NIOSH-approved organic-vapor-removing respirator must be equipped with:

- 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, or
- a NIOSH-approved organic vapor cartridge or a canister equipped with any N2, R, P, or HE prefilter.

This organic-vapor cartridge must be replaced with a new organic-vapor cartridge and new HEPA prefilter just prior to each use in sulfotepp-treated areas.

### PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### User Safety Requirements

In addition, any handler who handles this product in a greenhouse, including a handler who enters the greenhouse before the ventilation criteria have been met to initiate ventilation, must maintain continuous visual or voice contact with another handler. That other handler must have immediate access to the PPE required on this labeling for handlers in the event entry into the fumigated greenhouse becomes necessary for rescue.

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.

#### 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.

### DIRECTIONS FOR USE

Due to very high dermal and inhalation toxicity to humans.

- 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 use in commercial greenhouses only. Use in residential greenhouses or other indoor plant sites is prohibited.
- Do not apply this product to a greenhouse that is attached to another structure, including another greenhouse, unless the greenhouse to be treated is entirely sealed off from the other structures.
- Do not apply this product in any greenhouse that is located within 100 feet in any direction of a residential area (e.g., homes, apartments, schools, playgrounds, recreation areas).
- Entry to a treated structure by retail customers is prohibited for 48 hours after treatment or until ventilation criteria have been met.

## AGRICULTURAL USE REQUIREMENTS

cluding early entry that would otherwise be permitted under the WPS) by any person - other than a correctly trained and equipped certified applicator who is performing a handling task permitted by the WPS - is PROHIBITED in the entire greenhouse (entire enclosed structure/building) from the start of application until the greenhouse is ventilated as follows: 11 hours with no ventilation followed by (1) 5 air exchanges; (2) 1 hour of mechanical ventilation (fans); or (3) 2 hours of passive (vents) ventilation.

After the initial ventilation criteria have been met, workers are permitted to enter the treated greenhouse to perform tasks, including hand labor tasks, provided (1) they work in the sulfotepp-treated are no more than 4 hours in the first 24 hours following application; (2) they work in the sulfotepp-treated are no more than 4 hours in the period 24 hours to 48 hours following application; AND (3) for the first 48 hours following application when any worker is present in the treated greenhouse, the greenhouse is ventilated - continuously or intermittently - so that within each hour one of the following ventilation criteria has been met: 2 air exchanges or 5 minutes of mechanical (fans) ventilation, or 10 minutes of passive (vents, windows) ventilation.

**NOTIFICATION:** Notify workers of the application by warning them orally and by posting fumigant warning signs at all entrances to the greenhouse. The signs must bear the skull and crossbones symbol and state: (1) "Danger/Peligro". (2) "Greenhouse under fumigation, DO NOT ENTER/NO ENTRE". (3) the date and time of fumigation. (4) Plantfume 103 in use, and (5) name, address and phone number of the applicator. Post the fumigant warning sign instead of the WPS sign for this application, but follow all WPS requirements pertaining to location, legibility, size, and timing of the posting and removal.

## GENERAL PRECAUTIONS AND RESTRICTIONS

Notify local Fire Department before fumigating. For greenhouse use only on ornamental only such as Azalea, Carnations, Chrysanthemums, Geraniums, Roses, Snapdragons, and Poinsettias (see enclosed list). For use only against these pests: red spider, thrip, aphids, whiteflies, mealy bugs, and soft brown scale. Do not use on edible plants.

-Use on plants with open flowers not recommended, especially geraniums.

-Do not use when temperature is dropping, thereby forming condensation on ceiling, or droplets of water on leaves.

-Do not use immediately following foliar feeding.

-Application of fertilizers to soil, in reasonable, usual quantities present to known hazard to plants.

-Open ventilators 2 to 3 hours after fumigation on tender plants.

-\*Control of Certain Greenhouse Insects and Mites with Tetraethyl Dithiopyrophosphate Smokes\* gives comprehensive list of tolerant and non tolerant plants to Plantfume 103.

## PRE-APPLICATION INSTRUCTIONS

Close all greenhouse vents prior to use. Seal all holes, cracks, or openings in glass. Block or barricade entries and post fumigant warning signs as listed under **Notification**. Do not place generators on wood or other flammable materials as fire hazard may result.

Turn off misting systems. Keep generators a minimum of 2 feet away from plants. Temperatures in the greenhouse just between 70 Degrees F to 80 Degrees F. Foliage and blooms should be free of moisture and relative humidity should be low. Soil should be moist but do not water on the day of application. Do not fumigate when condensation is high.

Calculate volume in cubic feet of greenhouse space to be treated in order to determine amount of product required for application. Calculate the number of generators required to fumigate house. Remove this number of cans from carton. **USE ONLY THIS AMOUNT.** SHAKE VIGOROUSLY to fluff up or loosen the powder.

## APPLICATION DIRECTIONS

(1) All greenhouse vents must be closed and all circulating fans must be turned off.

(2) All misting systems must be turned off.

(3) A certified applicator wearing the baseline attire plus chemical-resistant gloves must perform the remaining tasks.

(4) Puncture both triangular marks as indicated on topside of can using tool furnished. If vertical evolution of smoke is preferred, puncture can on top lid instead of sides.

(5) Insert coated portion of ignitor downward through top to bottom of generator. So that the coated portion is facing downward with the bare wire portion plus a small part of coated portion remaining exposed.

**NEVER LIGHT IGNITOR FROM THE TOP AS FIRE WILL RESULT.**

(6) Place each canister in predetermined position in the greenhouse. Place cans on walks with punctured holes pointed lengthwise of the walks spaced to furnish equal distribution of smoke. If walks are very wet or wooded, set cans on empty clay flowerpots away from flammable material.

(7) After all canisters are set out, the canister furthest from the exit to the greenhouse must be ignited first.

(8) Applicator(s) must wear the appropriate respirator and must be monitored continuously from the start of ignition until the applicator has exited the greenhouse.

(9) If the canisters are placed in parallel walks, rather than one central aisle, one applicator must be assigned to light the canisters in each walk, at least one of which shall be a certified pesticide applicator, so that fumigation starts simultaneously and all applicators exit the greenhouse simultaneously.

(10) Each applicator lights the ignitor in each canister using a hand-held propane torch or butane lighter (not matches or wicked cigarette lighter) that should remain lit for the entire application.

(11) Each applicator continues quickly to the next can until all cans are ignited, then exits the greenhouse immediately.

(12) All entries to the structure must be blocked/barricaded and posted with the required fumigant warning signs.

(13) Entry into the greenhouse to relight ignitors that failed to activate the smoke generator is prohibited (if any smoke generator is activated in the greenhouse) unless the task is performed by a certified applicator wearing the specified personal protective equipment, including an air-supplied respirator or SCBA. The use of an organic-vapor removing respirator is prohibited for this task, regardless of the length of time spent in the treated area.

(14) If circulating fans are used, the fans may not be turned on until after the applicator(s) have exited the greenhouse.

(15) The canister will commence to smoke and the dose will continue to be effective for several hours. Maintain treatment conditions overnight.

**DANGER:** Failure to follow directions for lighting generators or misuse can result in sparks and flame causing ignition with nearby flammable materials. **KEEP THE IGNITORS TIGHTLY SEALED IN POLYETHYLENE ENVELOPE WHEN NOT IN USE.**

Repeat fumigation every three to four days until greenhouse is absolutely clean. No more than four consecutive doses. Fumigate as re-infestation appears.