

8536-41

03/10/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 10 2008

Ms. Mardel Belotinsky
Soil Chemical Corporation dba Cardinal Professional Products
PO Box 782
Hollister, CA 95024

Subject: Amendment - Revised Labels Per Latest Tech Label
Card-O-Vap 5, EPA Reg. No. 8536-40
Card-O-Vap 8, EPA Reg. No. 8536-41
Your submission dated November 29, 2007

Dear Ms. Belotinsky:

The above referenced labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to following comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. Delete the user limitation on the front panel beginning, "For Sale to Use and Storage by....etc". This statement implies that the product is a restricted use pesticide which is incorrect. Revise the following statement to read "Not for Use or Storage in or around Residential Sites". This statement is sufficient in limiting user groups and is enforceable.
2. With respect to PPE requirements replace the PPE statements on page 3 with those that appeared on the last accepted labeling.
3. The environmental hazards statement is for a manufacturing or technical use product not for end use product. Therefore replace it with the following statement:


"This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning the equipment or disposal of equipment washwaters.

If you sell products in containers sizes 5 gallons or greater in addition to the above statements add the statement beginning, "Do not discharge effluent containing this product....and ending.... Water Board or Regional Office of the EPA."

- 4. Reinstate the previous physical/Chemical hazard statements that appeared on the last accepted labeling. The statements you list now are for the manufacturing use product, not an end use product.
- 5. On pg 4 delete the user limitation "For Use and Storage by commercial, industrial and institutional applicators only". See comment One (1) above. Also note the product is not for use in institutions.
- 6. The container disposal statement on pesticide products have been revised according to PR Notice 2007-4. Refer to this notice and revise your statements accordingly. The web address for this PR Notice is:
http://www.epa.gov/opppmsd1/PR_Notices/#2007.
- 7. Under the warranty statements add, "To the extent consistent with applicable law" to the beginning of the sentence. "Neither this warranty nor any other warranty... etc".
- 8. Delete the words "Greenhouses and Mushroom Houses" under the Directions for use. These are not approved use sites for this product.
- 9. Under the If Swallowed Statement replace "Have person sip a glass of water if able to swallow" to "Do not give any liquid to the person". This is because of the high amount of petroleum solvent in this product compared to the technical product.

Please note that this acceptance letter does not constitute reregistration of your product. In the near future the Agency intends to issue a Data Call-In Notice (DCI) requiring label amendments, product specific data in accordance with the DDVP RED issued July 2006.

If you have any questions in regard to this letter please feel free to contact me at (703) 305-6100.


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

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Card-O-Vap 8

FOR SALE TO, USE AND STORAGE BY
COMMERCIAL AND INDUSTRIAL APPLICATORS ONLY
NOT FOR USE OR STORAGE IN OR AROUND THE HOME

FOR USE IN WAREHOUSES, SILOS, BULK BINS AND FOOD/FEED PROCESSING,
FOOD/FEED MANUFACTURING, HANDLING AND STORAGE PLANTS CONTAINING
NON-PERISHABLE, PACKAGED OR BAGGED RAW OR PROCESSED FOOD/FEED
COMMODITIES OR BULK RAW OR PROCESSED FOOD COMMODITIES, AND IN THE
NONFOOD/NONFEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS

ACTIVE INGREDIENTS:

2,2-dichlorovinyl dimethyl phosphate (Dichlorvos, DDVP)..... *7.8%
Related compounds..... 0.2%

OTHER INGREDIENTS** :..... 92.0%

TOTAL: 100.0%

ACCEPTED
with COMMENTS
In EPA Letter Dated:

* Equivalent to 8% Vapona Insecticide

**Contains Petroleum Distillates

MAR 10 2008

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

8536-41

KEEP OUT OF REACH OF CHILDREN



DANGER

PELIGRO

POISON [Note : « Poison » will be printed in red.]

*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.)*

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

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EMERGENCY INFORMATION
<ul style="list-style-type: none"> • Have the product container or label with you when calling a poison control center or doctor, or going for treatment. • For additional information, in case of an emergency, call Infotrac at 1-800-535-5053.
NOTE TO PHYSICIAN
<ul style="list-style-type: none"> • Symptoms include weakness, headache, 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, <i>Atropine Sulfate</i> should be injected at 10-minute intervals in doses of 1 to 2 milligrams until complete atropinization has occurred. <i>Pralidoxime chloride</i> (2-PAM) 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 gram. 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.

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS.



Cardinal Professional Products
P. O. Box 782 • Hollister, CA 95024-0782
(831) 637-1992

EPA Reg. No. 8536-41
EPA Est. 48498-CA-01

NET CONTENTS.....LBS.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER:

FATAL IF ABSORBED THROUGH THE SKIN. RAPIDLY ABSORBED THROUGH SKIN. MAY BE FATAL IF SWALLOWED OR INHALED. DO NOT BREATHE VAPORS. REPEATED INHALATION OR SKIN CONTACT MAY WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE THE SUSCEPTIBILITY TO DICHLORVOS (DDVP) POISONING. CAUSES MODERATE EYE IRRITATION. AVOID CONTACT WITH EYES. DO NOT GET ON SKIN OR CLOTHING. DO NOT CONTAMINATE FOOD OR FEED PRODUCTS.

REQUIRED PROTECTIVE CLOTHING

Persons who handle this product must wear the following protective clothing:

- 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)
- 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) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter
- Chemical-resistant apron

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds, fish, and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL AND CHEMICAL HAZARDS

Keep away from heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in any manner inconsistent with its labeling. **READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.**

**LIQUID FORMULATIONS FOR USE ONLY IN COMMERCIAL APPLICATION EQUIPMENT, SUCH AS CONVENTIONAL OR ULV FOGGING EQUIPMENT (SPACE TREATMENT)
(NOT FOR USE WITH HAND-HELD FOGGERS IN WAREHOUSES, GREENHOUSES, OR MUSHROOM HOUSES)**

- For use in warehouses, silos, bulk bins and food/feed processing, food/feed manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food/feed commodities or bulk raw or processed food/feed commodities and non-food/non-feed areas of processing/manufacturing plants*, for control of insects such as Indian Meal Moth, Red Flour Beetle, Confused Flour Beetle, Saw-toothed Grain Beetle, Merchant Grain Beetle, Cigarette Beetle, Drugstore Beetle, and Granary Weevil. Apply at the rate of 1 to 2 grams A.I. per 1,000 cubic feet or 1/2 to 1 oz. of liquid per 1,000 cubic feet. Check amount in insecticide tank or auxiliary tank before and after treatment to assure proper dosage has been applied. *Non-food/non-feed processing and manufacturing plant use areas include garbage rooms, lavatories, floor drains (to sewers entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

- Keep a minimum of a 7-day interval between applications except on cocoa beans and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams A.I. per 1,000 cubic feet of head space.
- Do not make applications when temperatures are below 60°F.
- All treatments must be made during the hours when buildings are unoccupied. Buildings treated must be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow unprotected workers to enter building during treatment. Place WARNING signs at entrances stating:

THIS BUILDING MUST BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS.

THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL PROTECTION EQUIPMENT FOR 24 HOURS; OR, UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE (e.g. a Dräger Tube) INDICATES THAT THE DDVP AIR CONCENTRATION IS EQUAL TO, OR LESS THAN, 50% OF THE PEL (0.1 ppm); AN AIR CONCENTRATION OF 0.05 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPMENT.

DO NOT ENTER PRIOR TO _____ AM OR PM ON _____ (Date) WITHOUT PERSONAL PROTECTION EQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE 50% OF THE PEL OR LESS.

In California, the building cannot be reentered without personal protection for 24 hours, unless the DDVP air concentration is 0.01 ppm or less. WARNING signs should read: "THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS. THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL PROTECTION EQUIPMENT FOR 24 HOURS; OR, UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE INDICATES THAT THE DDVP AIR CONCENTRATION IS EQUAL TO, OR LESS THAN 0.01 PPM. AN AIR CONCENTRATION OF 0.01 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPMENT. DO NOT ENTER PRIOR TO _____ AM OR PM ON _____ (Date) WITHOUT PERSONAL PROTECTION EQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE AT OR BELOW 0.01 PPM."

- **FOR USE AND STORAGE BY COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL APPLICATORS ONLY.** The term "non-perishable" means any raw or processed food/feed not subjected to rapid decay or deterioration that would render it unfit for consumption. Raw commodities would include: Animal feed, cocoa beans, dried beans, grain crops, peanuts, soybeans and nut crops. Raw commodities do not include eggs, milk, meat, poultry, fish, fresh fruits and vegetables. Processed food/feed would include: flour, sugar, cereals, packaged goods and crackers. Processed food/feed do not include: hermetically sealed food/feed or manufactured dairy products and other processed food/feed requiring freezing or refrigeration.
- When using in food/feed processing, food/feed manufacturing, handling and storage areas:

- Apply only during times when plant is not in operation and no food/feed products are exposed. If bulk, unpackaged food/feed is exposed, remove or cover before treatment begins.
- All food/feed processing surfaces must be covered during treatment or thoroughly cleaned before using.

NOTE—USE IS PROHIBITED IN:

- **The following food/feed manufacturing establishments:** bottling plants (including wineries, breweries, soft drinks), frozen food/feed (including pizza plants and ice cream plants) excluding non-food/non-feed manufacturing areas.
- **The following food/feed processing establishments:** meat, poultry and seafood slaughtering and/or packing plants (including edible fats and oils), frozen food/feed plants (including fruit and vegetables), dairy product plants (including milk processing plants) excluding non-food/non-feed processing areas.
- **Federally Inspected Meat and Poultry Plants**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store product in original container in a cool, dry, locked place out of reach of children.

DRUM HANDLING: Handle carefully to prevent damage and leakage. Open drums only when set on end and under a ventilated hood or when wearing an approved respirator and appropriate protective clothing. Unscrew bungs slowly to release internal pressure.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use 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. Metal: 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. Plastic: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY DISCLAIMER

Seller warrants that this product conforms to the chemical description on its label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. Neither this warranty nor any other warranty of **MERCHANTABILITY** or **FITNESS FOR A PARTICULAR PURPOSE**, express or implied, extends to the use of this product in a manner contrary to its label.