



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Mardel Belotinsky
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P.O. Box 1327
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AUG 24 2010

Subject: Tri-Form 35
EPA Reg. No. 11220-22
August 5, 2010 Request to Amend Label

Dear Ms. Belotinsky:

In the Agency letter of April 30, 2010, the Agency approved amended labeling for this registration with the condition that specific label revisions be made to the April 30, 2010 label stamped "Accepted with Comments". The Agency letter of June 21, 2010 required an additional revision to the April 30, 2010 label. This letter further amends the April 30, 2010 letter and label stamped "Accepted with Comments" by requiring the following additional changes:

1. In the April 30, 2010 letter comment number 14 is revised to read "On page 8 under number 1, revise the sixth bullet and sub-bullets to read, 'Handlers can remove full-face air-purifying respirators or resume work activities if the following conditions exist provided that a half-face air-purifying respirator is worn:
 - Two consecutive breathing zone samples for chloropicrin taken at the handling site at least 15 minutes apart must be less than 0.15 ppm,
 - Handlers do not experience sensory irritation, and
 - Air-purifying respirator cartridges have been changed.
 - During the collection of air samples a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.'"
2. In the April 30, 2010 accepted label, on page 18 under Application Depth, revise the first two bullets to read,
 - **"Tarped Bedded and Broadcast Applications:** The injection point must be a minimum of 8 inches from the nearest final soil/air interface.
 - **Untarped Bedded Applications:** The injection point must be a minimum of 12 inches from the nearest final soil/air interface."

The label associated with this change has been previously stamped "Accepted with Comments" and is dated April 30, 2010. Submit one copy of the final printed label that incorporates the required changes before the product is released for shipment. If you have any questions, please

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contact Andrea Carone by phone at (703) 308-0122 or via email at carone.andrea@epa.gov or
Mary Waller by phone at (703)308-9354 or via email at waller.mary@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
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