



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 30, 2022

Mardel Belotinsky
Registration Manager
Trical, Inc.
8100 Arroyo Circle
Gilroy, CA 95020-7305

Subject: Registration Review Label Mitigation for Chloropicrin
Product Name: Trical Technical
EPA Registration Number: 11220-44
Application Date: 7/17/2020
Decision Number: 582608

Dear Mardel Belotinsky:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Chloropicrin Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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If you have any questions about this letter, please contact Jaclyn Pyne by phone at 202-566-2326, or via email at pyne.jaclyn@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a long horizontal flourish extending to the right.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

TriCal Technical

FOR FORMULATING USE ONLY

Active Ingredient:
Chloropicrin.....99.7%
Other Ingredients:.....0.3%
Total:.....100.0%

ACCEPTED Mar 30, 2022 Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 11220-44

This product weighs 13.7 lbs. per gallon.

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

**IN ALL CASES OF OVEREXPOSURE GET MEDICAL ATTENTION IMMEDIATELY.
TAKE PERSON TO A DOCTOR OR TO AN EMERGENCY TREATMENT FACILITY.**

- **IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
- **IF ON SKIN OR CLOTHING:** Take off contaminated clothing, shoes, and other items covering the skin. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
- **IF IN EYES:** Hold eyes 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 eyes. Call a poison control center or doctor for treatment advice.
- **IF SWALLOWED:** 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.
- Have the product label with you when calling a poison control center or doctor or when going for treatment. You may also contact the American Association of Poison Control Center's Poison Help Line at 1-800-222-1222 seven days a week, 24 hours a day or your local poison control center for emergency medical treatment information.

NOTE TO THE PHYSICIAN: Chloropicrin is a volatile liquid that is the active ingredient in tear gas. As a gas it is a powerful lachrymator. Early symptoms of overexposure are lachrymation, respiratory distress, and vomiting. Pulmonary edema may develop later. Treatment is symptomatic.

NET WEIGHT: _____ LBS.
LOT NO.: _____

EPA REG. NO. 11220-44
EPA EST. NO. 62341-NC-1

**TRICAL, INC.
8100 Arroyo Circle – Gilroy, CA 95020-7305**

Draft Specimen Labeling Date: 2020 July 17

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

D A N G E R

May be fatal if inhaled or swallowed. Corrosive. Poisonous liquid and vapor. Liquid causes skin burns and irreversible eye damage. Do not get in eyes, on skin or on clothing. Do not breathe vapor or gas. Chloropicrin is readily identifiable by smell. Exposure to very low concentrations of vapor will cause irritation of eyes, nose, and throat. Continued exposure after irritation or higher concentrations may cause painful irritation to the eyes or temporary blindness.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are PPE constructed of Saranex, neoprene, nitrile, and chlorinated polyethylene. These materials provide short-term contact or splash protection against liquid in this product. Longer-term protection is provided by PPE constructed of Viton, Teflon, and EVAL barrier laminates (for example, responder suits manufactured by Life-Guard or Silvershield, gloves manufactured by North). Where chemical-resistant materials are required, leather, canvas, or cotton materials must not be worn as the sole article of protection when contact with this product is possible.

When performing tasks with NO potential for contact with liquid fumigant, all workers must wear:

- Long-sleeved shirt and long pants, and
- Shoes and socks.

When performing tasks with potential for contact with liquid fumigant, all workers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves,
- Chemical-resistant apron,
- Protective eyewear (Do **NOT** wear goggles), and
- Chemical-resistant footwear and socks.

ENVIRONMENTAL HAZARDS

Chloropicrin is toxic to mammals, 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 Pollutant 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 U.S. Environmental Protection Agency (EPA).

PHYSICAL OR CHEMICAL HAZARDS

Chloropicrin may be corrosive under certain conditions. **DO NOT USE WATER** to clean equipment. Flush equipment with nitrogen, compressed air or solvent. Do not use handling equipment or containers made from magnesium, aluminum, or alkali metals. Chloropicrin is a nonflammable liquid.

DIRECTIONS FOR USE

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

Only for formulation into a fumigant for the following uses: pre-plant soil fumigant in agricultural fields and commercial greenhouses; tree replantings; and remedial wood treatment.

PRE-FORMULATION REQUIREMENTS

Chloropicrin cannot be formulated into end-use products labeled for pre-plant or pre-transplant uses unless the end-use registrant makes available to certified applicators who purchase or apply the end-use product a registrant developed training program approved by EPA. The training program must provide information on (1) how to correctly apply the fumigant, including how to comply with new label requirements; (2) how to protect handlers and bystanders; (3) how to determine buffer zone distances; (4) how to complete a Site-Specific Fumigation Management Plan (FMP) and the post-application summary; (5) how to determine when weather and other site-specific factors are not favorable for fumigant application; (6) how to comply with required Good Agricultural Practices (GAPs) and how to document compliance with GAPs in the FMP; and (7) how to develop and implement emergency response plans. The registrant developed training program must be made available at least annually to the certified applicators. The end-use registrant must be able to provide, upon request, the names, addresses, and certified applicator license and/or certificate number of persons who successfully complete the registrant developed training program.

Chloropicrin cannot be formulated into end-use products labeled for pre-plant or pre-transplant uses unless the end-use registrant ensures Buffer Zone signs suitable for posting buffer zones or templates for the buffer zones signs are available to its downstream distributors/customers who in turn will provide the signs at the point of sale. Templates may be downloaded from

<https://www.epa.gov/soil-fumigants/buffer-zone-sign-template>

The Buffer Zone sign must meet the following standards:

- Signs must remain legible during the entire posting period, and must meet the general standards outlined in the Worker Protection Standard for sign size, text size, and legibility (see 40 CFR §170.120).

Contents of Sign



-- "DO NOT ENTER/NO
ENTRE,"
-- "Chloropicrin [Name
of Product] Fumigant
BUFFER ZONE,"
-- space for contact
information for the
certified applicator in
charge of the fumigation"

This product may be used to formulate products for any additional use(s) not listed on the Manufacturing Use Product label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a dry, well-ventilated area under lock and key. Post as a pesticide storage area. Persons moving or handling containers must wear the personal protective equipment specified in the *Personal Protective Equipment (PPE)* section of this labeling. Open container only in a well-ventilated area wearing protective clothing and respiratory protection if necessary.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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.

PESTICIDE CONTAINER HANDLING: Refillable Container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

RETURN CYLINDERS TO: Return cylinders to the place of purchase as designated on the Bill of Sale. Cylinders are the property of TriCal, Inc. and must be returned promptly by collect auto freight. (1) When a cylinder is empty, the valve must be closed, the safety cap screwed on the valve outlet, and the valve protection bonnet replaced prior to its return to the shipper. (2) Do not ship cylinders without safety caps or valve protection bonnets. (3) When a cylinder is partially full and there is no further requirement for the product, contact TriCal, Inc., the distributor or dealer representative for return instructions. (4) Containers must never be refilled by the consumer or used for any other product or purpose.

HANDLING: (1) Do not remove the valve protection bonnet and safety cap until the fumigant is about to be removed from the cylinder. The safety cap and valve protection bonnet must be replaced when the cylinder is not in use. (2) Do not subject cylinders to rough handling or to abnormal mechanical shock such as dropping, bumping, dragging, or sliding. (3) Do not use ropes, slings, hooks, tongs and similar handling devices for unloading cylinders. (4) A suitable hand truck, fork truck, or similar device to which the cylinders can be firmly secured must be used for transporting the heavier cylinders.

SHIPPING: This fumigant is classified in the U.S. Department of Transportation Hazardous Materials Regulations and must be shipped in accordance with DOT requirements. Describe empty cylinders as having last contained Chloropicrin (Inhalation Hazard). Do not ship with foods, feeds, or clothing.

SPILL AND LEAK PROCEDURES

Evacuate everyone from the immediate area of the spill or leak. For entry into affected area to correct problem, wear the personal protective equipment specified in the *Personal Protective Equipment (PPE)* section of this labeling. Move leaking or damaged containers outdoors or to an isolated location. Observe strict safety precautions. Work upwind, if possible. Allow spilled fumigant to evaporate or to absorb onto vermiculite, dry sand, earth, or similar absorbent material. Dispose of earth or other materials on site or at an approved disposal facility. Only correctly trained and PPE-equipped workers are permitted to perform such cleanup. Do not permit entry into the spill or leak area by any other person until the concentration of chloropicrin is measured to be less than **0.15 ppm**.

WARRANTY DISCLAIMER

Seller warrants that this product complies with the specifications expressed in this label. SELLER MAKES NO OTHER WARRANTIES; AND DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO WARRANTIES OF MERCHANTABILITY AND FITNESS FOR THE INTENDED PURPOSE. To the extent consistent with applicable law, Seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.