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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 1, 1997

Ms. Beverly M. Zapel
Regulatory Affairs Department
AmeriBrom, Inc.
52 Vanderbilt Avenue
New York, NY 10017

RE: "Methyl Bromide 100" (EPA Reg. No. 15298-4)
Your submission dated February 10, 1997

Dear Ms. Zapel:

The Agency has completed its review of the subject submission. The methyl bromide products supplemental manual is acceptable. The revised "Methyl Bromide 100" product label is accepted with the following comments:

In the statement which was added above the product name, change "Warning" to "Notice", "Attention" or other word. The word "Warning" must be used only as a signal word, and the appropriate signal word for this product is Danger.

A copy of the methyl bromide products supplementary manual stamped "Accepted" is being enclosed for records, along with a photocopy of the "Methyl Bromide 100" product label stamped "Accepted with Comments." A photocopy of the stamped "Accepted" front cover of the supplementary manual and a copy of the stamped "Accepted with Comments" product label is being included in the regulatory file jacket for "Methyl Bromide 100" (EPA Reg. No. 15298-4).

If you have any questions or concerns, please call me at (703) 305-6226, or Carl Grable of my staff at (703) 305-7392.

Sincerely yours,

A handwritten signature in cursive script that reads "Connie B. Welch".

Connie B. Welch,
Product Manager 21
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosures

DANGER
HIGH ACUTE TOXICITY

Extremely hazardous liquid and vapor under pressure. Do not breathe vapor. Inhalation may be fatal or cause serious acute illness or delayed lung or nervous system injury. Liquid or vapor can cause serious skin or eye injury which may have a delayed onset. Do not get liquid on skin, in eyes or on clothing.

Methyl bromide vapor is odorless and non-irritating to skin and eyes during exposure. Exposure to toxic levels may occur without warning or detection by the user.

NOTE TO PHYSICIAN: Early symptoms of overexposure are dizziness, headache, nausea and vomiting, weakness and collapse. Lung edema may develop in 2 to 48 hours after exposure, accompanied by cardiac irregularities; these effects are the usual cause of death. Repeated overexposure can result in blurred vision, staggering gait and mental imbalance, with probable recovery after a period of no exposure. Blood bromide levels suggest the occurrence, but not the degree, of exposure. Treatment is symptomatic.

METHYL BROMIDE 100

ENVIRONMENTAL HAZARDS: This pesticide is toxic to wildlife. 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 EPA.

PHYSICAL HAZARDS: Do not use or store near heat, open flames, or sparking electrical equipment.

CHEMICAL HAZARDS: Do not use application devices incorporating natural rubber or aluminum or magnesium or their alloys.

ACCEPTED
with COMMENTS
In EPA Letter Dated

4-1-97

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

15298-4

DIRECTIONS FOR USE

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

Methyl bromide is a highly hazardous material and should be used only by individuals trained in its proper use. Before using, read and follow all label precaution and directions, including the Manual for Safe Handling of Methyl Bromide Products No. AM-210.

All persons working with methyl bromide must be knowledgeable about the hazards, and trained in the use of required respirator equipment and detector devices, emergency procedures, and proper use of the fumigant.

PROTECTIVE CLOTHING: Wear loose cotton long sleeve shirt and pants, shoes and socks that are cleaned after each wearing. Do not wear jewelry, gloves or boots when handling. Methyl bromide is heavier than air and may be trapped inside clothing and cause skin injury. If full-face respiratory protection is not required, wear goggles or full face shield for eye protection when handling liquid. After application, immediately remove clothing, shoes and socks. Do not reuse contaminated clothing or shoes until cleaned. Drenched clothing cannot be adequately decontaminated.

RESPIRATORY PROTECTION: If the concentration of methyl bromide in the working area, as measured by a direct-reading detector device (e.g., Draeger hand pump and detector tube, etc. as described in the Product Manual), does not exceed 5 ppm (20 mg/m³), no respiratory protection is required. If this concentration is exceeded at any time, all persons in the working area must wear protective clothing and a NIOSH/MSHA approved self-contained breathing apparatus (SCBA) or combination air-supplied/SCBA respirator (see the Product Manual).

SPILL AND LEAK PROCEDURES: Evacuate immediate area of spill or leak. Use SCBA or combination air-supplied/SCBA respirator for entry into affected area to correct problem. Move leaking or damaged cylinders or containers outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spill to evaporate. Do not permit entry into spill area by unprotected persons until concentration of methyl bromide is determined to be less than 5ppm.

Contaminated soil, water, and other cleanup debris is a toxic hazardous waste. Report spill to the National Response Center (800-424-8802) if the reportable quantity of 1000 lbs. is exceeded.

BEST AVAILABLE COPY

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WARNING: Contains methyl bromide, a substance which harms public health and environment by destroying ozone in the upper atmosphere.

METHYL BROMIDE

100 (TECH)

A Nematicide, Insecticide, Herbicide For Formulation or Repackaging Into: End-Use Products Intended For Indoor Food/Feed Uses. End-Use Products Containing 0.25% or greater Chloropicrin intended for Terrestrial, Greenhouse, Domestic Outdoor, and Indoor Non-food Uses.

METHYL BROMIDE100 %

TOTAL100%

ACUTELY TOXIC CHEMICAL

14.4 LBS. Active Ingredient per gal. (LIQUID IN CYLINDER)

KEEP OUT OF REACH OF CHILDREN

DANGER



PELIGRO

POISON

PRECUACION AL USARIO: Si usted no lee Ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

STATEMENT OF PRACTICAL TREATMENT

In all cases of overexposure, get medical attention immediately. Take person to a doctor or emergency treatment facility.

If inhaled —Get exposed person to fresh air. Keep warm. Make sure person can breathe freely. If breathing has stopped apply artificial respiration. Do not give anything by mouth to an unconscious person.

If on skin —Immediately remove contaminated clothing, shoes, jewelry, and any other item on skin. Wash contaminated skin area thoroughly with soap and water.

If in eyes —Hold eyelids open and flush with a steady, gentle stream of water for at least 15 minutes.

See side panels for additional precautionary statements.

EPA REG. NO. 15298-4

- EPA EST. NO. 10163-AZ-01
- EPA EST. NO. 15298-IS-01
- EPA EST. NO. 29516-FL-04
- EPA EST. NO. 29516-NC-01

Manufactured by:
BROMINE COMPOUNDS LTD.
c/o AMERIBROM, INC.
52 Vanderbilt Avenue
New York, NY 10017

IN CASE OF EMERGENCY CONTACT:

CHEMTREC (300) 424-9300
OR
AMERIBROM WEST
5417 Santa Clara Ave.
Camarillo, CA 93010
Call Collect: (305) 988-9717 (CA)
(212) 286-4000 (NY)

Net contents: _____ Lbs./ _____ Kgs.

PESTICIDE STORAGE, HANDLING AND DISPOSAL

PESTICIDE STORAGE AND HANDLING: Store in dry, cool, well-ventilated area under lock and key. Post as a pesticide storage area.

Do not contaminate water, food or feed by storage. Store cylinders upright, secured to a rack or wall to prevent tipping. Cylinders should not be subjected to rough handling or mechanical shock such as dropping, bumping, dragging or sliding. Do not use rope slings, hooks, tongs, or similar devices to unload cylinders. Transport cylinders using hand truck, fork truck or other device to which the cylinder can be firmly secured.

Do not remove valve protection bonnet and safety cap until immediately before use. Replace safety cap and valve protection bonnet when cylinder is not in use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, either contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance, or follow registrant's instructions for return of partially empty cylinders.

CONTAINER DISPOSAL: When cylinder is empty, close valve by turning clockwise until hand tight, screw safety cap onto valve outlet, and replace protection bonnet before returning to shipper. Only the registrant is authorized to refill cylinders. Do not use cylinders for any other purpose. Follow registrant's instructions for return of empty or partially empty cylinders.

RETURN OF CYLINDERS:

(1) Cylinders are the property of the manufacturer or distributor where purchased and should be returned promptly by collect freight.

(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 the manufacturer or distributor for return instruction.

(4) Containers should never be refilled by the consumer or used for any other product or purpose.

Methyl Bromide,

UN 1062



POISON GAS

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INHALATION HAZARD

Warranty: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instructions or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

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MANUAL FOR THE SAFE HANDLING
AND APPLICATION OF

METHYL BROMIDE PRODUCTS

NO. AM-210

ACCEPTED
4-1-97

AmeriBrom, Inc.

52 VANDERBILT AVENUE, NEW YORK, NY 10017
TELEPHONE: (212) 286-4000 / 5898-4
FAX: (212) 286-4475