



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Brenda Burgess
ICL-IP America, Inc.
95 MacCorkle Ave., S.W.
South Charleston, WV 25303

DEC 21 2011

Subject: Methyl Bromide 100
EPA Registration Number 15298-4
Phase 2 Red Mitigation Amendment dated May 26, 2011
Decision Number 458983

Dear Ms. Burgess:

The amended labeling referred to above, submitted in connection with reregistration of chloropicrin under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable provided the following label revisions are made and the following conditions are met:

LABEL REVISIONS

1. On page 1, delete the restricted use box at the top of the page. Restricted use classification is not required for products intended for formulation (40 CFR 152.166 (b)).
2. On page 1, add the referral statement "See additional precautionary statements." if the precautionary statements are listed on the first page of the final printed label.
3. Move the sentence "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." which currently appears on page 4 to page 3 so that the sentence is immediately under the header "Directions for Use".
4. Move the following text which currently appears on page 4 to page 3 immediately below the misuse statement:
"Methyl bromide is a highly hazardous material and may be used only by individuals trained in its proper use. Before using, read and follow all label precautions and directions.
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.
Technical methyl bromide is a nematicide, insecticide, herbicide used for formulation or repackaging into end-use products intended for indoor food/feed uses. End-use products containing 0.25% or greater Chloropicrin are intended for terrestrial, greenhouse, domestic outdoor, and indoor non-food uses."

5. On page 5, revise the header "Pesticide Storage, Handling and Disposal" to read "Storage and Disposal".
6. On page 5, revise the section "Pesticide Storage and Handling" to read as follows:
 "Pesticide Storage: Store in a secure manner either outdoors under ambient conditions, or indoors in a well ventilated area. Post as a pesticide storage area. Store cylinders upright, secured to a rack or wall to prevent tipping. Do not subject cylinders 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."
7. On page 5, revise the section "Container Disposal" to read as follows:
 "Container Handling: Refillable container. Do not reuse this container for any other purpose. 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. Follow registrant's instructions for return of empty or partially empty cylinders."
8. On page 5 under Return of Cylinders, revise items (1) and (4) as follows:
 "(1) Cylinders are the property of the manufacturer or distributor where purchased and must be returned promptly by collect freight." and "(4) Containers must not be refilled by consumer or used for any other product or purpose."

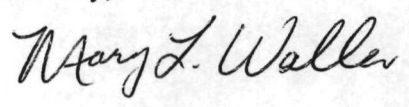
CONDITIONS

1. EPA has determined that the risk mitigation measures on the revised label for this product are necessary to adequately protect human health and the environment. Therefore, pursuant to 40 CFR § 152.130(d), EPA has decided that no product bearing previously approved labeling may be sold or distributed (released for shipment) by its registrant after December 1, 2012. Wherever state approval is required for sale or distribution of this product with this new labeling, EPA strongly encourages you to submit an application to the state authority as soon as possible. You should be aware that the Agency does not intend to modify the December 1, 2012 deadline because of any failure to obtain state approvals.
2. Submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

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One copy of the label stamped "Accepted with comments" is enclosed for your records. If you have any questions, you may contact me via email, waller.mary@epa.gov or by phone at (703) 308-9354.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicides Branch
Registration Division (7504P)

Enclosure

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**RESTRICTED USE PESTICIDE
DUE TO ACUTE TOXICITY.**

For retail sale to and use by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

**METHYL BROMIDE 100
(TECH)**

(For Manufacturing Use Only)

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.

ACTIVE INGREDIENT:	By Wt.
METHYL BROMIDE.....	<u>100%</u>
TOTAL.....	100%

ACUTELY TOXIC CHEMICAL

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

KEEP OUT OF REACH OF CHILDREN

ACCEPTED
with COMMENTS
In EPA Letter Dated

12/21/2011

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

15298-4

DANGER

PELIGRO



POISON

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

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 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 poison control center or doctor for 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

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-420-9236 for emergency medical treatment information.

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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.

Manufactured by:

Bromine Compounds Ltd.
c/o ICL-IP America, Inc.
95 MacCorkle Ave., SW,
South Charleston, WV 25303
Tel: (304) 720-3950
Fax: (304) 746-3101

EPA Reg. No. 15298-4

EPA Est. No. 15298-ISR-01

EPA Est. No. 11220-CA-8

IN CASE OF EMERGENCY, CONTACT -

CHEMTREC: (800) 424-9300 or (703) 527-3887 (Collect calls accepted) [24 Hrs.]
or ICL-IP America/Clearon Emergency Response: (304) 746-3000 [24 Hrs.]

Net Contents: _____ Lbs. / _____ Kgs.

AB04-Rev.6

05-26-11

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
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.

PROTECTIVE CLOTHING: Wear a loose long sleeve shirt and long 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 full face shield or safety glasses with brow and temple side shields (DO NOT WEAR GOGGLES) 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), does not exceed 5 ppm (20 mg/rn³), no

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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.

ENVIRONMENTAL HAZARDS: This pesticide 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 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.

DIRECTIONS FOR USE

Only for formulation into a pre-plant soil fumigant for uses, users, and locations that at the time of the application qualify for exemptions under the Montreal Protocol (e.g., critical use exemption or quarantine and preshipment exemption uses) and for the following uses that do not qualify for exemptions: Peppers (grown for fresh market in CA), Tomato (grown for fresh market in CA), Caneberries (Raspberries, Blackberries, Boysenberries), Ginger (HI), Vidalia Onion (GA), Golf Course Tees, Greens, and Fairways, Athletic Fields, and Tobacco Seedling Trays. All end use products that contain *Directions for Use* for crops/use sites that at the time of the application do not qualify for exemptions under the Montreal Protocol or that are not listed above must be changed to remove those crops/use sites. All structural/space uses have been cancelled.

Methyl bromide formulated into end-use products containing 98% methyl bromide must contain directions for use only for the following uses: orchard replant; ornamentals (hot gas method only); forest seedlings; golf course tees, greens, and fairways (hot gas method only); athletic fields (hot gas method only); and quarantine uses. All other use sites and use patterns are prohibited and must be removed from the end-use product labeling.

Methyl bromide cannot be formulated into end-use products labeled for pre-plant uses without the use of tarps with the exception of California orchard replant for Critical Use Exemption (CUE) use using the deep broadcast application method and hand held tree-hole applications.

Methyl bromide 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 an 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 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.

Methyl bromide 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 zone 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 http://www.epa.gov/pesticides/reregistration/soil_fumigants/index.htm.

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 WPS for sign size, text size, and legibility (see 40 CFR §170.120).

Contents of Sign



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

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

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 may be used only by individuals trained in its proper use. Before using, read and follow all label precautions and directions.

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.

Technical methyl bromide is a nematicide, insecticide, herbicide used for formulation or repackaging into end-use products intended for indoor food/feed uses. End-use products containing 0.25% or greater Chloropicrin are intended for terrestrial, greenhouse, domestic outdoor, and indoor non-food uses.

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 5 ppm.

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.

PESTICIDE STORAGE, HANDLING AND DISPOSAL

Do not contaminate water, food or feed by disposal.

PESTICIDE STORAGE AND HANDLING: Store in a secure manner either outdoors under ambient conditions, or indoors in a well ventilated area. 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.

Warranty; Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, Seller makes no 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 or 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

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