

19713-298

07-15-2010

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Luz Chan  
1700 Channel Avenue  
P.O. Box 13327  
Memphis, TN 38113-0327

JUL 15 2010

Subject: Drexel Phume Soil Fumigant  
EPA Reg. No. 19713-298  
Update to Label Amendment Letter

Dear Ms. Chan:

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". This letter further amends the April 30, 2010 letter by revising the label comments and by requiring additional changes.

1. (Label p.2) (EPA Comment 2-a)  
Replace EPA's comment with this text:
  - At the bottom of the "Personal Protective Equipment" section, add the following sentences: "DO NOT transport contaminated clothing inside a closed vehicle unless stored in a sealed container. Wash or dispose as specified."
2. (Label p.2)  
Remove the following text from the "Directions for Use" section:
  - "CALIFORNIA ONLY: Application must be in compliance with Technical Information Bulletin for California entitled 'Metam Sodium Guideline for All Application Methods in California.' This information bulletin may be obtained from you local pesticide dealer or a Metam Sodium registrant."
3. (Label p.3)  
Revise the text as follows at the end of the "Protection for Handlers" section:
  - "Cartridges or canisters must be replaced when odor or irritation from this product becomes apparent, if the measured concentration of MITC is greater than 6000 ppb, or after 8 hours of use, whichever occurs first."
4. (Label multiples pages)  
Remove the "Air Temperature" section from all GAPs.

5. (Label p.7) (EPA Comment 6-b)

Replace EPA's comment with this text:

- In the wind speed section of the "Center Pivot" section, replace the first two bullets with the following:
  - For sprinkler or **center pivot** applications: 1) not using a solid stream type nozzle, OR 2) having a release height or spray height greater than 4 feet, OR 3) having 30 lbs or greater PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 10 mph.
  - For sprinkler or **center pivot** applications using 1) a solid stream, AND 2) having release height and spray height less than 4 feet, AND 3) having 29 lbs. or less PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 25 mph.

6. (Label p.13)

In the "Observe the Following Precautions...Public Water System" section, revise the text as follows:

- Any alternatives to the ~~above~~ required safety devices in this label must conform to the list of EPA-approved alternative devices.

7. (Label p.17)

Delete the "Tarp Method" section under "Tobacco Plant Beds".

8. (Label p.18)

Verify that the warranty and disclaimer language is up to date. See the link below for further information.

<http://www.epa.gov/oppfead1/labeling/lrm/chap-12.htm#IX>

The label associated with these changes 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 contact Cathryn O'Connell by phone at (703) 308-0136 or via email at [occonnell.cathryn@epa.gov](mailto:occonnell.cathryn@epa.gov) or Erik Kraft by phone at (703)308-9358 or via email at [kraft.erik@epa.gov](mailto:kraft.erik@epa.gov).

Sincerely,



Erik Kraft  
Acting Product Manager (20)  
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