

PM-13

Reg # 19713 - 353

7/9/97

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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09 JUL 1997

Ms. Barbara Brown
Drexel Chemical Company
P.O. Box 13327
1700 Channel Ave.
Memphis, TN 38113-0327

Dear Ms. Brown:

Subject: Label Amendments in Response to Basic Suppliers
Deletion of Certain DDVP Uses
DDVP 90% Concentrate
Reg. NO. 19713-353
Your Submission Dated May 10, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments given below. Three copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped label is enclosed for your records.

- Under the IMPREGNATED RESIN PEST STRIPS section add the following to the sentence: Homes, cabins, garages, ... milk rooms and enclosed utility boxes...
- Also add the following statement to that section making it (2).

It is strongly recommended that all resin pest strips for use by homeowners or in homes be packaged in a cage that allows application (dispensing) with minimal contact with the strip and, is difficult to open.

- Following Cat and Dog Flea Collars, add the following statement:

DRY BAIT FORMULATIONS: For outdoor use around homes, cabins, garages, commercial buildings, garbage or refuse collection and disposal areas, farm and domestic animal buildings.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Do not use where animals can come into contact or consume the product.

- 4. Under Total Release Aerosol/Foggers: add the following to the first sentence:

Percentage of DDVP A.I. Treatment at 0.5 gms/1000 ft. max.

- 5. Under Aerosol/fogger Spray Can - Not Total Release add the following statement as item 6:

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed, in serving areas while food/feed is exposed or facility is in operation.

- 6. Under Use is Prohibited in: add the following paragraph defining what a non-food/feed processing manufacturing area is: Non-food/feed processing areas: Includes areas such as garbage rooms, lavatories, floor drains (to sewers entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

- 7. Revise your warning statement as follows: After the statement:

"Place Warning signs at all entrances...unprotected workers. Revise the following statement to read as follows:

THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL PROTECTION EQUIPMENT FOR 24 HOURS; OR UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE (e.g. a Drager Tube) INDICATES THAT THE DDVP AIR CONCENTRATION IS EQUAL TO, OR LESS THAN, 50% OF THE PEL (0.1 PPM); AN AIR CONCENTRATION OF 0.05 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPMENT.

DO NOT ENTER PRIOR TO _____ AM OR PM ON _____ (Date) WITHOUT PERSONAL PROTECTION EQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE 50% OF THE PEL OR LESS.

- 8. Under "Liquid Formulations for Agricultural/Commercial use only" add the following as paragraph (2)

Do no make direct application to livestock more frequently than once per day.

- 9. Under "Liquid Formulations" for the indoor crack and crevice section, add the following as paragraph (5).

Do not treat more than 5 application sites per day and do not make DDVP applications more than once per week.

- 10. Revise the heading under "Liquid Formulations for the following uses to" read as follows:

For use in mushroom houses and greenhouses (non food crops) at 2.0 gms/1000 cubic feet maximum.

Following item (1) add statement (2) Keep a minimum of 7 day interval between applications.

- 11. Under Note: Use is Prohibited In: add the following statement defining what a non-food/feed processing manufacturing area is:

Non-Food/Feed Processing Areas: Includes areas such as garbage rooms, lavatories, floor drains (to sewers entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

- 12. Revise paragraph (4) starting with "THIS BUILDING SHOULD BE OPENED AND ... to read the same as that indicated in paragh 7 above.

- 13. Throughout the label use the term "food/feed" rather than food or feed.

- 14. Revise the second sentence under Environmental Hazards as follows:

"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 modified in writing prior to discharge."

A copy of the latest DDVP Technical Label from Amvac Chemical Corporation is enclosed as a reference.

If there are questions concerning the above changes, please contact me at 703 305-6100.

Sincerely,

George T. LaRocca
 Product Manager (13)
 Insecticide Branch
 Registration Division (7505C)

Enclosures:

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ACCEPTED
with COMMENTS
in EPA Letter Dated

7/9/97

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-353

DDVP 90% CONCENTRATE
NOT FOR RESALE UNDER THIS LABEL

AN INSECTICIDE FOR
FORMULATING USE ONLY

ACTIVE INGREDIENTS:

2,2-Dichlorovinyl Dimethyl Phosphate..... 86.5%
Related Compounds..... 3.5%

INERT INGREDIENTS:..... 10.0%

TOTAL:..... 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER-POISON-PELIGRO



"PRECAUCION AL USARIO: Si usted no lee ingles, no use este
producto hasta que la etiqueta haya sido explicado ampliamente."

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center
immediately. Induce vomiting by giving victim 1 or 2 glasses
of water and touching back of throat with finger. Never induce
vomiting or give anything by mouth to an unconscious or
convulsing person.

IF INHALED: Remove victim to fresh air immediately. Apply
artificial respiration if indicated. Get medical attention.

IF IN EYES: Flush eyes with plenty of water for at least 10
minutes. Get medical attention immediately.

IF ON SKIN: Remove contaminated clothing immediately and wash
affected area with soap and water. Call a physician
immediately. Wash clothing before reuse.

EPA REG. NO. 19713-353

EPA EST. NO. 19713-

NET WEIGHT:

For the following Emergencies phone 24 hours a day:
Transportation-Chemtrec 1-800-424-9300

Manufactured By
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: POISONOUS IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN AND EYES. RAPIDLY ABSORBED THROUGH SKIN. REPEATED INHALATION OR SKIN CONTACT MAY WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE SUSCEPTIBILITY TO DICHLORVOS (DDVP) POISONING.

Do not swallow or get in eyes, on skin or on clothing. Do not breathe vapor. Do not contaminate food or feed products.

REQUIRED PROTECTIVE CLOTHING

Persons who handle this product must wear the following protective clothing: protective suit of one or two pieces covering all parts of the body except head, hands, and feet, chemical resistant gloves; chemical resistant shoes (or chemical resistant shoe coverings or chemical resistant boots); respirator with either an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G); and a chemical resistant apron.

NOTE TO PHYSICIAN

Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pin point pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps.

TREATMENT: Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, Atropine Sulfate should be injected at 10 minute intervals in doses of 1 to 2 milligrams until complete atropinization has occurred. Pralidoxime chloride (2-PAM) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion in 250 cc of saline over a 15 to 30 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5 percent solution in water over not less than two minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children the dose of 2-PAM is 0.25 gram.

Morphine is an improper treatment.

Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may without warning cause prolonged susceptibility to very small doses of any cholinesterase inhibitor. Allow no further exposure until cholinesterase regeneration has been attained as determined by blood test.

ENVIRONMENTAL HAZARDS

This product is toxic to birds, fish, and aquatic invertebrates. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

CHEMICAL AND PHYSICAL PROPERTIES

Keep away from heat or open flame. Formulators using this product are responsible for obtaining EPA registration of their formulated products and to provide data to support their registrations.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

FOR FORMULATION OF DICHLORVOS INSECTICIDE PRODUCTS ONLY.

This product is intended only for use in the formulation of other dichlorvos insecticide products. Products formulated using Drexel DDVP Technical Grade will require registration with the Environmental Protection Agency.

This product is for formulation into end-use products intended only for use on the following sites.

The use sites for which dichlorvos products may be used are formulation specific.

Any limitations, cautions, restrictions or instructions stated below for any particular use site or formulation must be incorporated in the "end-use" label language.

DRY FORMULATIONS

IMPREGNATED DISPENSER: Enclosed outdoor utility equipment such as communications, electric, gas, water and cable television.

1. FOR INDUSTRIAL/COMMERCIAL USE ONLY. NOT FOR INDOOR USE OR WHERE PERSONS ARE PERMANENTLY ASSIGNED OR RESIDING.

IMPREGNATED RESIN PEST STRIPS: Homes, cabins, garages, basements, motels, museum collections, insect traps, campers, trailers, garbage cans, catch basins, trash dumpsters, animal

buildings and dairy milk rooms. Non-perishable packaged and bagged and bulk stored processed and raw agricultural commodities (including soybeans, corn, grains, cocoa beans and peanuts).

1. Do not use in hospitals or clinical rooms, such as patient rooms, wards, nurseries, operating or emergency areas. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement. Do not use in kitchens, or areas where food is prepared or processed. Not to be taken internally by humans and animals. Do not use in food processing or food manufacturing areas of food processing and food manufacturing plants.

IMPREGNATED RESIN CAT AND DOG FLEA COLLARS

AEROSOL/FOGGER FORMULATIONS

TOTAL RELEASE AEROSOL/FOGGERS

Percentage of DDVP A.I. 1.0% or less.

1. For use only in homes, cabins, garages, basements, animal buildings and dairy milk rooms.
2. After application, do not reoccupy premises for at least 2 hours. Before reoccupying, open all doors and windows and ventilate thoroughly for at least 1 hour.
3. Do not use in kitchens unless food is removed or covered during treatment. Cover all food preparation surfaces, dishes and food handling equipment before treatment. Thoroughly wash all food preparation surfaces, dishes and food handling equipment after treatment.

TOTAL RELEASE AEROSOL/FOGGERS

Percentage of DDVP A.I. greater than 1.0%. Treatment at 0.5 grams/1,000 cubic feet maximum.

1. For use only in homes, warehouses, railroad cars, theaters and industrial plants.
2. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.
3. After application, do not reoccupy treated areas for at least 2 hours. Before reoccupying, open all doors and windows and ventilate thoroughly for at least 1 hour.
4. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement.

- 5. Do not use in kitchens unless food is removed or covered during treatment. Cover all food preparation surfaces, dishes and food handling equipment before treatment. Thoroughly wash all food preparation surfaces, dishes and food handling equipment after treatment.
- 6. Do not use to treat non-perishable bagged and/or bulk stored raw or processed agricultural commodities.

AEROSOL/FOGGER SPRAY CAN - NOT TOTAL RELEASE

- 1. For crack and crevice use only in homes, cabins, garages, basements, animal buildings, dairy milk rooms, warehouses and industrial plants.
- 2. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.
- 3. Do not use as a space spray, use only as crack and crevice treatment.
- 4. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement.
- 5. Do not use to treat non-perishable bagged and/or bulk stored raw or processed agricultural commodities.

COMMERCIAL AEROSOL/FOGGERS FOR THE FOLLOWING USES

- 1. For use in warehouses, silos, bulk bins and food processing, food manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food commodities or bulk raw or processed food commodities.
- 2. FOR SALE TO, USE AND STORAGE BY COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL APPLICATORS ONLY.

The term "non-perishable" means any raw or processed food not subject to rapid decay or deterioration that would render it unfit for consumption. Raw commodities would include: Animal feed, cocoa beans, dried beans, grain crops, peanuts, soybeans and nut crops. Raw commodities do not include: eggs, milk, meat, poultry, fish, fresh fruits and vegetables. Processed foods would include: flour, sugar, cereals, packaged goods and crackers. Processed foods do not include: hermetically sealed foods or manufactured dairy products and other processed foods requiring freezing or refrigeration.

- 3. When using in food processing, food manufacturing, handling and storage areas:
 - a. Apply only during times when plant is not in operation and no food products are exposed. If bulk, unpackaged

foods are exposed, remove or cover before treatment begins.

- b. All food processing surfaces should be covered during treatment or thoroughly cleaned before using.

NOTE: USE IS PROHIBITED IN:

food manufacturing establishments: bottling plants (including wineries, breweries, soft drinks), frozen food (including pizza plants and ice cream plants) excluding non-food manufacturing areas.

food processing establishments: meat, poultry and seafood slaughtering and/or packing plants (including edible fats and oils), frozen food plants (including fruit and vegetables), dairy product plants (including milk processing plants) excluding non-food processing areas.

- 4. a. Keep a minimum of a 7 day interval between applications except on cocoa beans and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams A.I. per 1,000 cubic feet of head space.
- b. Do not make applications when temperatures are below 60°F.
- 5. All treatments should be made during the hours when buildings are unoccupied. Buildings treated should be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow unprotected workers to enter buildings during treatment. Place WARNING signs at all entrances stating: "THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS OR REMAIN UNOCCUPIED BY UNPROTECTED WORKERS FOR AT LEAST 6 HOURS AFTER TREATMENT. DO NOT ENTER PRIOR TO _____ O'CLOCK _____ (DATE) _____ WITHOUT PROTECTION."

LIQUID FORMULATIONS

LIQUID FORMULATIONS FOR AGRICULTURAL/COMMERCIAL USE ONLY: For use in areas under the general category of farm buildings, (farm yards); manure treatments on farm premises; dairy and farm premises; feed lots, including around feed lots, stockyards, corrals, holding pens, fences etc.; animal buildings, including barns, feeding areas, shelters and stables; dairy barns (including milk rooms, equipment and barnyards); livestock feeding areas; pens, poultry, droppings, poultry houses (equipment and yards); beef cattle, poultry, dairy cattle, goats, horses (including ponies), sheep, swine and turkeys.

- 1. All formulations for the above uses must state:
FOR AGRICULTURAL/COMMERCIAL USE ONLY
NOT FOR SALE FOR ANY OTHER USES

LIQUID FORMULATIONS FOR THE FOLLOWING USES: Indoor crack and crevice use in non-food areas of commercial/institutional and industrial areas; domestic dwellings (including campers, hotels, motels, tourist courts). For outdoor use including patios and lawns; kennels, including outside runways, window sills and ledges; outside surfaces of buildings, including porches, screens, window frames, eaves, patios, garages; refuse dumps; refuse and solid waste containers; wine cellars.

1. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.
2. For indoor use, only crack and crevice treatments are permitted. Space spray is prohibited.
3. Do not use in hospitals or clinical rooms, such as patient rooms, wards, nurseries, operating or emergency areas. Do not use in any rooms where infants, or the sick or aged are, or will be present for any extended period of confinement.
4. Do not use in food handling establishments, restaurants, or areas where food is prepared or processed. Do not use to treat non-perishable bagged and/or bulk stored raw or processed agricultural commodities.

LIQUID FORMULATIONS FOR VETERINARY USE ONLY: For direct applications to domestic animals, dogs, cats and other small animals (sponge, spray and dip).

1. All formulations for the above uses must state:
 FOR VETERINARIAN USE ONLY
 NOT FOR SALE FOR ANY OTHER USES

LIQUID FORMULATIONS FOR THE FOLLOWING USES: For use in mushroom houses.

1. FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS OR CERTIFIED APPLICATORS ONLY.

LIQUID FORMULATIONS FOR USE ONLY IN COMMERCIAL APPLICATION EQUIPMENT SUCH AS CONVENTIONAL OR ULV FOGGING EQUIPMENT (SPACE TREATMENT):

1. For use in warehouses, silos, bulk bins and food processing, food manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food commodities or bulk raw or processed food commodities.
2. FOR SALE TO, USE AND STORAGE BY COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL APPLICATORS ONLY.

The term "non-perishable" means any raw or processed food not subject to rapid decay or deterioration that would render it unfit for consumption. Raw commodities would include: Animal feed, cocoa beans, dried beans, grain crops, peanuts, soybeans and nut crops. Raw commodities do not include: eggs, milk, meat, poultry, fish, fresh fruits and vegetables. Processed foods would include: flour, sugar, cereals, packaged goods and crackers. Processed foods do not include: hermetically sealed foods or manufactured dairy products and other processed foods requiring freezing or refrigeration.

3. When using in food processing, food manufacturing, handling and storage areas:

- a. Apply only during times when plant is not in operation and no food products are exposed. If bulk, unpackaged foods are exposed, remove or cover before treatment begins.
- b. All food processing surfaces should be covered during treatment or thoroughly cleaned before using.

NOTE: USE IS PROHIBITED IN:

food manufacturing establishments; bottling plants (including wineries, breweries, soft drinks), frozen food (including pizza plants and ice cream plants) excluding non-food manufacturing areas.

food processing establishments: meat, poultry and seafood slaughtering and/or packing plants (including edible fats and oils), frozen food plants (including fruit and vegetables), dairy product plants (including milk processing plants) excluding non-food processing areas.

4. All treatments should be made during the hours when buildings are unoccupied. Buildings treated should be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow unprotected workers to enter buildings during treatment. Place WARNING signs at all entrances stating: "THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKERS OR REMAIN UNOCCUPIED BY UNPROTECTED WORKERS FOR AT LEAST 6 HOURS AFTER TREATMENT. DO NOT ENTER PRIOR TO _____ O'CLOCK _____ (DATE) _____ WITHOUT PROTECTION".

DRUM HANDLING: Handle carefully to prevent damage and leakage. Open drums only when set on end and under a ventilated hood. Unscrew bungs slowly to release internal pressure.

STORAGE AND DISPOSAL

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

STORAGE: Store product in original container in a cool, dry, locked place out of reach of children.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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.

CONTAINER DISPOSAL: (Metal) Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. (Plastic) Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following:

LIMITED WARRANTY:

Drexel Chemical Company warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather, and crop conditions.

There are no express warranties other than those set forth herein. Drexel Chemical Company neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, expressed or implied. Drexel Chemical Company expressly excludes and disclaims all implied warranties of merchantability, fitness for particular purpose, or any other warranty of quality or performance.

This warranty does not extend to, and the user shall be solely responsible for, any loss or damage which results from the use of this product in any manner which is inconsistent with this label's directions, warnings or cautions. User's exclusive

