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Ms. Jody A. Fox
Director of Regulatory Affairs
Midland Fumigant Company, Inc.
P.O. Box 627
1805 South 2nd Street
Leavenworth, KS 66048

Dear Ms. Fox:

Subject: TRITOX 55% TABLETS, EPA Registration No. 30574-8
Your Submissions of June 16, 1998, July 27, 1998, August 25, 1998,
and "September 14, 1998"

The proposed revised Confidential Statement of Formula (CSF) dated "6/16/98" is not acceptable. That CSF describes a product composed entirely of ingredients of foreign origin but which is claimed to be made in the U.S. In a telephone conversation with Don Fox on September 15, 1998, I learned that this product actually is to be manufactured in China and imported into the U.S. It also appears from the CSF of "6/16/98" that the product's active ingredient would come from an unregistered source. Before a switch to this unregistered source can be considered, you must submit the following items:

1. a "Description of Beginning Materials and Manufacturing Process" [Guideline No. 61-2(A)];
2. a discussion of "Formation of Impurities" [Guideline No. 61-2(B)];
3. a "Sample Analysis [Guideline No. 62-1];
4. a new "Basic" CSF [Guideline No. 62-2] which identifies the facility in China as the producer; and
5. an "Analytical Method" [Guideline No. 62-3].

The analytical method may be cited (by MRID No.) if it is identical to a method previously approved for another registered Aluminum Phosphide product. All data submissions except for the CSF must be in conformance with PR Notice 86-5; and all newly run studies must be in compliance with the Good Laboratory Practice (GLP) Standards rule, 40 CFR, §160.

The proposed revised container label submitted on June 16, 1998, is basically acceptable, but the changes identified below must be incorporated into your final printed labeling.

1. To comply with PR Notices 93-3 and 93-8, replace the third sentence ("Do not apply . . . potholes") of the "**ENVIRONMENTAL HAZARDS**" section with

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

2. Convert the last sentence of the second paragraph under "DISPOSAL" in the "**STORAGE AND DISPOSAL**" section into two sentences which read as shown below.

It also is permissible to remove lids and expose empty flasks to atmospheric conditions until residue in flasks is reacted. Then, puncture and dispose of flasks in a sanitary landfill or other approved site, or by other procedures approved by State and local authorities.

3. As the only manuals which you have submitted for this product are entitled "**APPLICATOR'S MANUAL FOR TRI-TOX 55% PELLETS AND TABLETS OF ALUMINUM PHOSPHIDE**", all of the container label's references to manuals must clearly refer to this manual, which may be called the "**APPLICATOR'S MANUAL**" for short. As you have submitted nothing called "MIDLAND FUMIGANT INC.'s APPLICATOR'S MANUAL", the container label should make no references to such a document. If you indeed have something called "MIDLAND FUMIGANT INC.'s APPLICATOR'S MANUAL" which differs from the "**APPLICATOR'S MANUAL FOR TRI-TOX 55% PELLETS AND TABLETS OF ALUMINUM PHOSPHIDE**", the label may make no references to "MIDLAND FUMIGANT INC.'s APPLICATOR'S MANUAL" until such time, if any, that a manual by that name is reviewed and accepted by EPA as part of the labeling for this product. Change all references to "MIDLAND FUMIGANT INC.'s APPLICATOR'S MANUAL" to references to the "**APPLICATOR'S MANUAL**".

We did not review the version of the "**APPLICATOR'S MANUAL FOR TRI-TOX 55% PELLETS AND TABLETS OF ALUMINUM PHOSPHIDE**" submitted on June 16, 1998, because a newer proposed revised manual was included with your letter of July 27, 1998. The version of the "**APPLICATOR'S MANUAL FOR TRI-TOX 55% PELLETS AND TABLETS OF ALUMINUM PHOSPHIDE**" submitted on July 27, 1998, has its pages out of order, apparently because a booklet was disassembled for photocopying. As I told Don Fox by telephone on September 15, 1998, we would not stamp such a document.

The version of the manual submitted on "September 14, 1998" reflects the telephone conversation of September 15, 1998, in that the pages appear in proper order, except for the absence of page 6. I made copies of page 6 from the version of the manual submitted on July 27, 1998, and inserted them in the proper place in each copy of the manual that you submitted on "September 14, 1998". The text in the resulting version of the manual is basically acceptable, but the changes identified below must be incorporated into your proposed revised manual.

1. In item #3 of the "SAFETY RECOMMENDATION SUMMARY" (page 3), change "Alp" to either "aluminum phosphide" or "ALP".
2. In item #19 of the "SAFETY RECOMMENDATION SUMMARY" (page 3), change "which" to "they".
3. In the second sentence of item #21 of the "SAFETY RECOMMENDATION SUMMARY" (page 3), change "They recommend" to "OSHA recommends".
4. In the first sentence of item #3 of "SECTION 3 DIRECTIONS FOR USE" (page 5), change "ALP" to either "aluminum phosphide" or "ALP".
5. In the first sentence of item #8 of "SECTION 3 DIRECTIONS FOR USE" (page 5), change "concentration" to "concentrations".
6. In the first sentence of item #10 of "SECTION 3 DIRECTIONS FOR USE" (page 5), change "atmosphere" to "atmospheric".
7. Change the asterisked footnote to the table ("**Dosage Guidelines for Fumigations with TRI-TOX**") at the top of page 8 to read as follows:

*Dosage rates for dates, nuts and dried fruits are 100-200 pellets or 20-40 tablets per 1000 cu. ft. and 125-250 pellets or 25-50 tablets per 1000 bu.

8. Split the second sentence of item "F.3.a." ("Fumigation of Flat Storages", page 9) into the two sentences indicated below.

Treatment of these types of storages may require considerable effort. Therefore, sufficient manpower should be available to complete the work rapidly enough to prevent excessive exposure to hydrogen phosphide gas.

9. Change "steam" to "stream" in the second (and last) sentence of item "3.b." ["Fumigation of Vertical Storages (concrete upright bins and other silos in which grain can be rapidly transferred)", page 9].
10. In item "F.5.g" ("Fumigation of Mills, Food Processing Plants and Warehouses", page 10), change "dispose it" to "dispose of it".

- 11. In the caption to item "F.8.d." ("In transit Fumigation of Containers Aboard Ships", page 11), change "In transit" to "In-transit". Make the same change in the first sentence of text under this caption.
- 12. Immediately under "SECTION 10 DISPOSAL INSTRUCTIONS" (page 15), insert the subheading "A. General" so that it precedes this section's first set of four numbered items.
- 13. Convert the last sentence of the first paragraph of item "4." under "SECTION 10 DISPOSAL INSTRUCTIONS A. General" (page 15) into two sentences which read as shown below.

It also is permissible to remove lids and expose empty flasks to atmospheric conditions until residue in flasks is reacted. Then, puncture and dispose of flasks in a sanitary landfill or other approved site, or by other procedures approved by State and local authorities.

Submit one (1) copy of each element of final printed labeling (including the bulletin and container labels) for this product before releasing it for shipment. Such final printed labeling must incorporate the changes indicated in this letter. As we have not yet received final printed labeling for your products 30574-9, 30574-10, and 30574-11, we assume that these products have not been released for shipment under the labeling which we "ACCEPTED with COMMENTS" on June 25, 1997. If this is not the case, you must immediately submit final printed labeling for these products.

Sincerely yours,



William W. Jacobs, Ph. D.
 Insecticide-Rodenticide Branch
 Registration Division (7505C)

enclosures

RESTRICTED USE PESTICIDE

DUE TO ACUTE INHALATION TOXICITY OF HIGHLY TOXIC PHOSPHINE GAS

For retail sale and use only by Certified Applicators for those uses covered by the Applicator's certification or persons trained in accordance with the attached Applicator's Manual working under the direct supervision of, and in the physical presence of the Certified Applicator on site or on the premises.
READ AND FOLLOW THE LABEL AND THE TRI-TOX™ APPLICATOR'S MANUAL WHICH CONTAINS COMPLETE INSTRUCTIONS FOR THE SAFE USE OF THIS PESTICIDE.

TRI-TOX™

55% TABLETS OF ALUMINUM PHOSPHIDE

A fumigant for use against listed insects which infest listed raw Agricultural Commodities, Specified Processed Foods, Animals Feeds and Control of Burrowing Pests. (See Applicator's Manual)

ACTIVE INGREDIENT:

Aluminum Phosphide	55%
INERT INGREDIENTS	45%
Total	100%

KEEP OUT OF REACH OF CHILDREN

DANGER



PELIGRO

POISON

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta se le haya sido explicado simplemente.

STATEMENT OF PRACTICAL TREATMENT

Symptoms of overexposure to phosphine are headache, dizziness, nausea, difficult breathing, vomiting and/or diarrhea. In all cases of overexposure, get medical attention immediately. Take victim to a doctor or emergency treatment facility.

IF THE GAS FROM ALUMINUM PHOSPHIDE IS INHALED: Get exposed person to fresh air. Keep warm and make sure person can breathe freely. If breathing has stopped, give artificial respiration by mouth-to-mouth or other means of resuscitation. Do not give anything by mouth to an unconscious person.

IF ALUMINUM PHOSPHIDE TABLET IS SWALLOWED: Drink or administer one or two glasses of water and induce vomiting by touching back of throat with finger or, if available, syrup of ipecac. Do not give anything by mouth if victim is unconscious or not alert.

IF POWDER, GRANULES OR TABLETS OF ALUMINUM PHOSPHIDE GET ON SKIN: Brush material off clothes and shoes in a well ventilated area. Allow clothes to aerate in a ventilated area prior to laundering. Wash contaminated bare skin thoroughly with soap and water.

IF IN EYES: Flush with plenty of water. Get medical attention.

SEE SIDE PANEL AND APPLICATOR'S MANUAL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 30574-8

EPA EST. NO. 146-210-01

General 7000 Route 46-210

Manufactured by

MIDLAND FUMIGANT CO. INC.

1805 South 2nd Street

Leavenworth, Kansas 66048

SEP 21 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act is amended, for the pesticide registered under EPA Reg. No. 30574-8

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

KEEP OUT OF REACH OF CHILDREN

DANGER - POISON

Aluminum phosphide powder, granules, or tablets may be fatal if swallowed. Do not get in eyes, on skin, or on clothing. Do not eat, drink or smoke while handling aluminum phosphide fumigants. If a sealed container is opened, or if the material comes in contact with moisture, water or acids, extremely toxic phosphine gas will be released. If a garlic odor is detected, you must monitor to determine whether phosphine gas is present above the acceptable exposure limits (see section on respiratory protection). Since an odor may not be detected under certain circumstances, the absence of a garlic odor does not mean that phosphine gas is absent. Observe proper application, aeration, re-entry and disposal procedures specified elsewhere in the labeling to prevent overexposure.

NOTE TO PHYSICIAN: Aluminum phosphide reacts with moisture in the air, acids and many other liquids to release phosphine gas. Mild exposure by inhalation causes malaise, ringing of ears, fatigue, nausea and/or pressure in the chest which is relieved by removal to fresh air. Moderate poisoning causes weakness, vomiting, epigastric pain, chest pain, diarrhea and/or dyspnea. Severe poisoning may occur in a few hours to several days, resulting in pulmonary edema and may lead to dizziness, cyanosis, unconsciousness and/or death. In sufficient quantity, phosphine affects the liver, kidneys, lungs, nervous system and circulatory system. Inhalation can cause lung edema and hyperemia, small perivascular brain hemorrhages and brain edema. Ingestion can cause lung and brain symptoms, but damage to the viscera is more common. *Phosphine poisoning may result in (1) pulmonary edema; (2) liver elevated serum GOT, LDH and alkaline phosphatase, reduced prothrombin, hemorrhage and jaundice; and (3) kidney hematoma and anuria. Pathology is characteristic of hypoxia.* Frequent exposure over a period of days or weeks may cause poisoning. Treatment is symptomatic.

ENVIRONMENTAL HAZARDS
This product is highly toxic to fish and wildlife. Non-target organisms exposed to phosphine gas will be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water by cleaning of equipment or disposal of wastes. See Applicator's Manual for additional Environmental Hazards.

PHYSICAL/CHEMICAL HAZARDS

Aluminum phosphide in tablets or partially spent dust will release phosphine gas if exposed to moisture from the air or if it comes into contact with water, acids and many other liquids. Piling of tablets or dust from their fragmentation may cause a temperature increase and confine the release of gas so that ignition could occur.

Always open container of aluminum phosphide products outdoors, as under certain conditions they may flash upon opening. When opening, point the container away from the face and body and slowly loosen the cap. Although the chances for flash are very remote, never open these containers in a flammable atmosphere. These precautions will also reduce the applicator's exposure to phosphine gas. Pure phosphine gas is practically insoluble in water and oils, and is stable at normal fumigation temperatures. However, it may react with certain metals and cause corrosion, especially at higher temperatures and relative humidities. Metals such as copper, brass, other copper alloys and precious metals such as gold and silver are susceptible to corrosion by phosphine. Thus, small electric motors, smoke detectors, brass sprinkler heads, batteries and battery chargers, fork lifts, temperature monitoring systems, switching gears, communication devices, computers, calculators and/or other electrical equipment should be protected or removed before fumigation. Phosphine gas will also react with certain metallic salts and, therefore, sensitive items such as photographic film, some inorganic pigments, etc., should not be exposed.

STORAGE AND HANDLING

Store under lock and key, in a dry, well-ventilated area away from heat. Post as a pesticide storage area. Do not contaminate water, food or feed by storing pesticides in the same areas used to store these commodities. Do not store in buildings inhabited by humans or domestic animals. Aluminum phosphide products shall not be placed in or attached to packages intended for retailers.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This fumigant is a highly hazardous material and may only be used by individuals trained in its proper use. Before using, read and follow all precautions and complete directions for use on the TRI-TOX™ label and in the TRI-TOX™ APPLICATOR'S MANUAL. Additional APPLICATOR'S MANUALS and MSDS are available through MIDLAND FUMIGANT CO. INC., 1805 South 2nd, Leavenworth, KS 66048, (913) 651-3900

SPILL AND LEAK PROCEDURES

A spill, other than incidental to application or normal handling, may produce high levels of gas. Therefore, attending personnel must wear SCBA or its equivalent when the concentration is unknown. Other NIOSH/MSHA approved respiratory protection may be worn if the concentration is known. Do not use water at any time to clean up a spill of aluminum phosphide. Water in contact with unreacted aluminum phosphide tablets will greatly accelerate the production of phosphine gas which could result in a toxic and/or fire hazard. Wear cotton gloves when handling this product. Return all intact containers to cardboard cases or other suitable packaging which has been properly marked according to DOT regulations. Notify consignee and shipper of damaged cases. If containers have been punctured or damaged so as to leak, the container may be temporarily repaired with aluminum tape or the aluminum phosphide may be transferred from the damaged containers to a sound metal container which should be sealed and properly labeled as aluminum phosphide. Transport the damaged container to an area suitable for pesticide storage for inspection. Further instructions and recommendations may be obtained, if required, from MIDLAND FUMIGANT CO. INC.

STORAGE AND DISPOSAL

STORAGE:

Store in a locked, dry, well ventilated area away from heat. Post as a pesticide storage area. Do not contaminate water, food or feed by storing pesticide in the same areas used to store these commodities. Do not store in buildings inhabited by humans or domestic animals.

DISPOSAL:

Unreacted or partially reacted aluminum phosphide is 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 representatives at the nearest EPA Regional Office for guidance. For specific instructions, see Spill and Leak Procedures. Some local and state waste disposal regulations may vary from the following recommendations. Disposal procedures should be reviewed with appropriate authorities to ensure compliance with local regulations. Contact your State Pesticide or Environmental Control Agency or Hazardous Waste Specialist at the nearest EPA Regional Office for guidance.

Triple rinse entire container and stopper with water. 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. It is also permissible to remove lids and expose empty containers outdoors until residue in the containers is reacted, then puncture container and dispose of in a sanitary landfill or other approved site, or by other procedures approved by state and federal authorities.

If properly exposed, the residual dust remaining after a fumigation with aluminum phosphide will be grayish-white and contain only a small amount of unreacted material. However, residual dust from incompletely exposed aluminum phosphide will require special care. Refer to MIDLAND FUMIGANT INC.'s APPLICATOR'S MANUAL for specific instructions.

SEE APPLICATOR'S MANUAL FOR ADDITIONAL INFORMATION

WARRANTY

Seller does not make any warranties expressed or implied on the usage of the product other than those directed on the label. Customer assumes all risks in handling and use of this material contrary to label recommendations.

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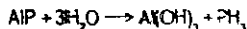
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SECTION 1
INTRODUCTION

TRI-TOX fumigants are used to protect stored commodities from damage by insects and for the control of burrowing pests. Fumigation of stored products with TRI-TOX in the manner prescribed in the labeling does not contaminate the stored commodity.

TRI-TOX and other Aluminum Phosphide fumigants are acted upon by atmospheric moisture to produce Hydrogen Phosphide (phosphine, PH₃ gas. TRI-TOX tablets and pellets contain aluminum phosphide (AIP) as their active ingredient and will liberate hydrogen phosphide via the following chemical reaction:

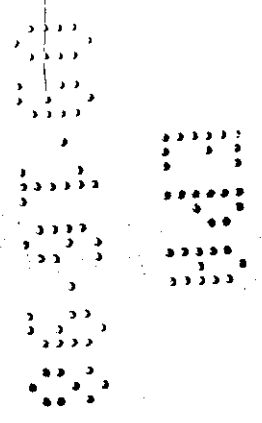


Hydrogen phosphide gas is highly toxic to insects, burrowing pests, humans, and other forms of animal life. In addition to its toxic properties, the gas will corrode certain metals and may ignite spontaneously in air at concentrations above its lower flammable limit of 1.8% (v/v). These hazards will be described in greater detail later on in this Applicator's Manual for TRI-TOX pellets and tablets.

TRI-TOX also contains ammonium carbamate which liberates ammonia and carbon dioxide as follows:



These gases are essentially nonflammable and act as inerting agents to reduce fire hazards. The ammonia gas also serves as a warning agent.



TRI-TOX is prepared in two forms: tablets and pellets. The rounded tablets weigh approximately 3 grams and release 1 gram of hydrogen phosphide gas. They are about 16mm in diameter and are bulk packaged in resealable aluminum flasks containing 100 or 500 tablets each. The pellets weigh approximately 0.6 grams and release 0.2 gram of hydrogen phosphide gas. They are about 18 mm in diameter and are packaged in resealable flasks containing about 1660 pellets.

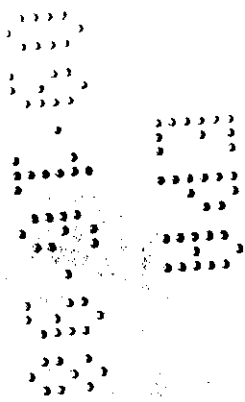
Upon exposure to air, TRI-TOX pellets and tablets begin to react with atmospheric moisture to produce small quantities of hydrogen phosphide gas. This reaction starts slowly, gradually accelerates and then lapers off again as the aluminum phosphide is spent. TRI-TOX pellets react somewhat faster than do the tablets. The rates of decomposition of the tablets and pellets will vary depending upon moisture and temperature conditions. For example, when moisture and temperature of the fumigated commodity are high, decomposition of TRI-TOX may be complete in less than 3 days. However, at lower ambient temperatures and relative humidity levels, decomposition of TRI-TOX may require 5 days or more. After decomposition, TRI-TOX leaves a gray-white powder composed almost entirely of aluminum hydroxide and other approved inert ingredients. This will cause no problems if the fumigant has been added directly to commodities such as grain or bulk animal feed. However, the spent powder must usually be retrieved for disposal after space fumigations. If properly exposed, the spent TRI-TOX will normally contain only a small amount of unreacted aluminum phosphide and may be disposed of without hazard. While not considered a hazardous waste, partially spent residual powder from incompletely exposed TRI-TOX will require special care. Precautions and instructions for further deactivation and disposal will be given later in this Manual.

TRI-TOX pellets and tablets are supplied in gas-tight containers and their shelf life is unlimited as long as the packaging remains intact. Once opened for fumigation, the flasks of tablets and pellets may be tightly resealed and stored for future use. Storage and handling instructions will be given in detail later in this Applicator's Manual.

A Summary of Safety Recommendations is Outlined Below:

SAFETY RECOMMENDATION SUMMARY

1. Carefully read the labeling and follow instructions.
2. Never fumigate alone from inside the storage structure.
3. Person supervising must be a certified fumigator and personnel assisting must be trained in the use of Alp. Never allow uninstructed personnel to handle TRI-TOX.
4. Approved respiratory protection must be available for the fumigation of structures from within.
5. Wear dry gloves of cotton or other material if contact with TRI-TOX tablets or pellets is likely. Aerate used gloves and other contaminated clothing in a well-ventilated area prior to laundering. Wash hands thoroughly after using TRI-TOX.
6. Open fumigant containers in open air only. Never open in a flammable atmosphere.
7. Do not allow TRI-TOX to contact liquid.
8. Do not allow TRI-TOX to pile up.
9. Dispose of empty containers and spent residual dust in a manner consistent with the label instructions.
10. Post warning placards on fumigated areas.
11. Prior to fumigation, notify appropriate company employees. Provide to local officials (fire department, rescue squad, police, etc.) on an annual basis relevant safety information for use in the event of an emergency.
12. Hydrogen phosphide fumigants are not to be used for vacuum fumigations.
13. Exposure to hydrogen phosphide must not exceed the eight hour TWA of 0.3 ppm during application, or a ceiling concentration of 0.3 ppm after application is completed.
14. Fumigated areas must be aerated to 0.3 ppm hydrogen phosphide or less prior to reentry by unprotected workers.
15. Finished foods and feeds that have been fumigated with TRI-TOX must be aerated for 48 hours prior to offering to the end use consumer.
16. Transfer of a treated commodity to another site without complete aeration is permissible, provided that the new storage site is placarded if its concentration is above 0.3 ppm.
17. Keep containers of TRI-TOX tightly closed except while removing product for application.
18. Protect materials containing metals such as copper, silver, gold and their alloys and salts from corrosive exposure to hydrogen phosphide.
19. Tablets and/or pellets must not come in contact with any processed food except that which may be added directly to processed brewers rice, malt and corn grits used in the manufacture of beer.
20. Do not use aluminum phosphide containers for any purpose other than recycling or reconditioning.
21. OSHA recommends pre-exposure screening of employees to detect impaired pulmonary function. They recommend that any employees developing this condition be referred for medical examination.



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**SECTION 2
PRECAUTIONARY STATEMENTS**

A. Hazards to Humans and Domestic Animals

DANGER: Aluminum phosphide from TRI-TOX tablets or pellets may be fatal if swallowed. Do not get in eyes, on skin or on clothing. Do not eat, drink or smoke while handling aluminum phosphide fumigants. If sealed container is opened, or if the material comes in contact with moisture, water or acids, these products will release hydrogen phosphide (phosphine, PH₃) which is an extremely toxic gas. If a garlic odor is detected, refer to the Industrial Hygiene Monitoring Section on page 14 of the Applicator's Manual for appropriate monitoring procedures. Pure hydrogen phosphide gas is odorless: the garlic odor is due to a contaminant. Since the odor of hydrogen phosphide may not be detected under some circumstances, the absence of a garlic odor does not mean that dangerous levels of hydrogen phosphide gas are absent. Observe proper reentry procedures specified elsewhere in the labeling to prevent overexposure.

B. Statement of Practical Treatment

Symptoms of overexposure are headache, dizziness, nausea, difficult breathing, vomiting, and diarrhea. In all cases of overexposure, get medical attention immediately. Take victim to a doctor or emergency treatment facility.

If the gas or dust from aluminum phosphide is inhaled: Get exposed person to fresh air. Keep warm and make sure person can breathe freely. If breathing has stopped, give artificial respiration by mouth-to-mouth or other means of resuscitation. Do not give anything by mouth to an unconscious person.

If aluminum phosphide pellets or tablets are swallowed: Drink or administer one or two glasses of water and induce vomiting by touching back of throat with finger, or if available, syrup of ipecac. Do not give anything by mouth if victim is unconscious or not alert.

If powder or granules of aluminum phosphide get on skin or clothing: Brush or shake material off clothes and shoes in a well ventilated area. Allow clothes to aerate in a ventilated area prior to laundering. Do not leave contaminated clothing in occupied and/or confined areas such as automobiles, vans, motel rooms, etc. Wash contaminated skin thoroughly with soap and water.

If dust from pellets or tablets gets in eyes: Flush with plenty of water. Get medical attention.

C. Note to Physician (we recommend that this section be given to the attending physician)

Aluminum phosphide tablets or pellets react with moisture from the air, acids and many other liquids to release hydrogen phosphide (phosphine PH₃) gas. Mild exposure by inhalation causes malaise (indefinite feeling of sickness), ringing in the ears, fatigue, nausea and pressure in the chest which is relieved by removal to fresh air. Moderate poisoning may occur within a few hours to several days resulting in pulmonary edema (fluid in lungs) and may lead to dizziness, cyanosis (blue or purple skin color), unconsciousness, and death.

In sufficient quantity, phosphine affects the liver, kidneys, lungs, nervous system and circulatory system. Inhalation can cause lung edema (fluid in lungs) and hyperemia (excess of blood in body parts), small perivascular brain hemorrhages and brain edema (fluid in brain). Ingestion can cause lung and brain symptoms but damage to the viscera (body cavity organs) is more common. Phosphine poisoning may result in (1) pulmonary edema, (2) liver elevated serum GOT, LDH and alkaline phosphatase, reduced prothrombin, hemorrhage, and jaundice (yellow skin color) and (3) kidney hematuria (blood in urine) and anuria (abnormal or lack of urination). Pathology is characteristic of hypoxia (oxygen deficiency in body tissue). Frequent exposure to concentration above permissible levels over a period of days or weeks may cause poisoning. Treatment is symptomatic.

The following measures are suggested for use by the physician in accordance with his own judgment: In its milder form, symptoms of poisoning may take some time (up to 24 hours) to make their appearance, and the following is suggested:

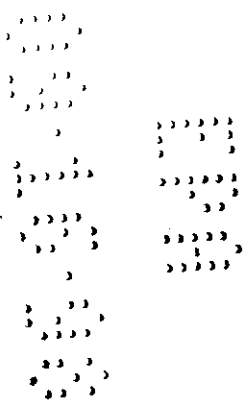
- 1. Give complete rest for 1-2 days, during which the patient must be kept quiet and warm.
- 2. Should patient suffer from vomiting or increased blood sugar, appropriate solutions should be administered. Treatment with oxygen-breathing equipment is recommended as is the administration of cardiac and circulatory stimulants.

In cases of severe poisoning (Intensive Care Unit recommended):

- 1. Where pulmonary edema is observed, steroid therapy should be considered and close medical supervision is recommended. Blood transfusions may be necessary.
- 2. In case of manifest pulmonary edema, venesection should be performed under vein pressure control. Heart glycosides (I.V.) (in case of hemoconcentration, venesection may result in shock). On progressive edema of the lungs: immediate intubation with a constant removal of edema fluid and oxygen over-pressure respiration, as well as any measures required for shock treatment. In case of kidney failure, extracorporeal hemodialysis is necessary. There is no specific antidote known for the poisoning.
- 3. Mention should be made here of suicidal attempts by taking solid phosphine by mouth. After swallowing: emptying of the stomach by vomiting, flushing of the stomach with diluted potassium permanganate solution of magnesium peroxide until flushing ceases to smell of carbide. Thereafter, apply carbomedicinals.

D. Physical and Chemical Hazards

Aluminum phosphide in tablets and pellets will release hydrogen phosphide if exposed to moisture from the air or if it comes in contact with water, acids and many other liquids. Piling of tablets or pellets from their fragmentation may cause a temperature increase and confine the release of gas so that ignition could occur.



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It is preferable to open containers of aluminum phosphide products in open air, as under certain conditions, they may flash upon opening. You may also wish to open containers near a fan or other appropriate ventilation which will rapidly exhaust contaminated air. When opening, point the container away from the face and body and slowly loosen the cap. Although the chances for a flash are remote, never open the containers in a flammable atmosphere. These precautions will also reduce the fumigator's exposure to hydrogen phosphide.

Pure phosphine (hydrogen phosphide) gas is practically insoluble in water, fats and oils, and is stable at normal fumigation temperatures. However, it may react with certain metals and cause corrosion, especially at higher temperatures and relative humidities. Metals such as copper, brass and other copper alloys, and precious metals such as gold and silver are susceptible to corrosion by phosphine. Thus, small electric motors, smoke detectors, brass sprinkler heads, batteries and battery chargers, fork lifts, temperature monitoring systems, switching gears, communication devices, computers, calculators and other electrical equipment should be protected or removed before fumigation. Hydrogen phosphide will also react with certain metallic salts and therefore, sensitive items such as photographic film, some inorganic pigments, etc. should not be exposed.

**SECTION 3
DIRECTIONS FOR USE**

A. General

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

1. TRI-TOX tablets and pellets are Restricted Use Pesticides due to the acute inhalation toxicity of hydrogen phosphide (phosphine PH₃) gas. These products are for retail sale to and use only by certified applicators for uses covered by the applicator's certification or persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of the certified applicator. Physical presence means on site or on the premises. Read and follow the label and the TRI-TOX Applicator's Manual which contains complete instructions for the safe use of this pesticide.

2. TRI-TOX is a highly hazardous material and should be used only by individuals trained in its proper use. Before using, read and follow the label precautions and directions. Additional copies of this Manual are available from: Midland Fumigant Co., Inc., 1805 S 2nd Street, Leavenworth, KS, 66048 (800) 332-3930.

Persons working with TRI-TOX should be knowledgeable of the hazards of this chemical and trained in the use of required respiratory equipment and detector device, emergency procedures and use of the fumigant.

3. A licensed fumigator must be present and at least two persons trained in the use of ALP should be present during fumigation of structure if entry into the structure is required for application of the fumigant. Two trained persons must also be present during reentry into fumigated or partially aerated structures. Only one trained person is required to be present when TRI-TOX is applied from outside the area to be treated.

4. Shipholds, barges, containers on ships, railroad cars and containers shipped piggyback by railway may be fumigated in transit. However, trucks, vans, trailers and similar transport vehicles cannot be moved over public roads and highways until they are aerated and the warning placards removed.

5. Do not fumigate commodities with TRI-TOX when commodity temperature is below 40 degrees F. (5 degrees C.).

6. The site to be fumigated must first be inspected to determine if it can be sufficiently gas tight. Then a plan should be developed to provide for safe and efficient application of the fumigant to include emergency procedures, etc., where required, and decide how monitoring should be conducted to prevent excessive exposures.

7. Wear dry gloves of cotton or other material while handling TRI-TOX tablets and pellets. Wash hands thoroughly after use.

8. Hydrogen phosphide gas may flash at concentration above its flammable limit. Therefore, always open TRI-TOX containers in open air and never in a flammable atmosphere. This precaution will not only prevent harm in the unlikely event of a flash, but will reduce the applicator's exposure to hydrogen phosphide gas.

9. Piling of tablets or pellets or addition of liquid to TRI-TOX may speed up the reaction, cause a temperature increase and confine the gas so that ignition could occur.

10. As much as is possible, protect unused TRI-TOX from excessive exposure to atmosphere moisture during application and tightly reseal the aluminum flask prior to returning tablets or pellets to storage.

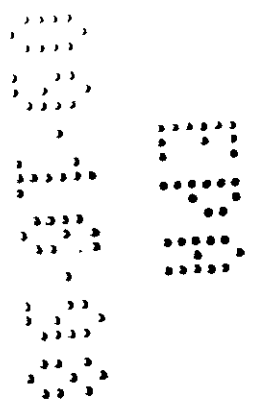
11. Hydrogen phosphide gas may react with certain metals and their salts to produce corrosion. Copper, copper alloys and precious metals such as silver and gold are susceptible to corrosion and items containing these elements should be removed or protected prior to fumigation with TRI-TOX.

12. Do not allow TRI-TOX or its residual dust to come in contact with processed foods or commodity packages intended for retailers except that TRI-TOX tablets or pellets may be added directly to processed brewers rice, malt and corn grits used in the manufacture of beer.

13. Respiratory protection approved for the concentration to which the fumigator will be exposed must be available if TRI-TOX is to be applied from within the structure to be fumigated. Respiratory protection need not be available for uses such as outdoor application, addition of tablets or pellets to automatic dispensing devices, etc., if exposures above the TLVs will not be encountered.

A NIOSH/MSHA approved, full-face gas mask-hydrogen phosphide canister combination may be used at levels up to 15 ppm. Above this level or in situations where the hydrogen phosphide concentration is unknown, a NIOSH/MSHA approved, self-contained breathing apparatus (SCBA) or its equivalent must be used.

14. Notify appropriate company employees prior to fumigation. Provide to local officials (fire department, rescue squad, police, etc.) on an annual basis relevant safety information for use in the event of emergency.



B. Efficacy

TRI-TOX has been found effective against the following insects and their preadult stages — that is eggs, larvae, and pupae:

almond moth	European grain moth	Mediterranean flour moth
angoumois grain moth	fat grain beetle	pine barkworm
bean weevil	flour flies	rasna moth
beet	granary weevil	red flour beetle
carabid	greaser wax moth	rice weevil
cereal leaf beetle	hairy fungus beetle	rusty grain weevil
cigarette beetle	hessian fly	saw-toothed grain beetle
confused flour beetle	Indian meal moth	spider beetles
dermestid beetles	chakra beetle	tobacco moth
dried fruit beetle	Lesser grain borer	yellow meal worm
dried fruit moth	nausea weevil	

Although it is possible to achieve total control of the listed insect pests, this is frequently not realized in actual practice. Factors contributing to less than 100% control are leaks, poor gas distribution, unfavorable exposure conditions, etc. In addition, some insects are less susceptible to hydrogen phosphide than others. If maximum control is to be attained, extreme care must be taken in sealing, the higher dosages must be used, exposure periods must be lengthened, proper application procedures followed, and temperature and humidity must be favorable.

C. Exposure Conditions

The following conditions may be used as a guide in determining the minimum length of the exposure period at the indicated temperatures:

Temperature	Pellets	Tablets
below 40°F (5°C)	Do not fumigate	Do not fumigate
40°-53°F (5-12°C)	8 days (192 hours)	10 days (240 hours)
54°-59°F (12-15°C)	4 days (96 hours)	5 days (120 hours)
50°-68°F (16-20°C)	3 days (72 hours)	4 days (96 hours)
above 68°F (20°C)	2 days (48 hours)	3 days (72 hours)

The length of the fumigation must be great enough so as to provide for adequate control of the insect pests which infest the commodity being treated. Additionally, the fumigation period should be long enough to allow for more or less complete reaction of TRI-TOX with moisture so that little or no unreacted aluminum phosphide remains. This will minimize exposures during further storage and/or processing of the treated bulk commodity as well as reduce hazards in the disposal of partially spent aluminum phosphide products remaining after space fumigations. The proper length of the fumigation period will vary with exposure conditions, since, in general, insects are more difficult to control at lower temperatures and the rate of hydrogen phosphide gas production by TRI-TOX is less at lower temperatures and humidities.

It should be noted that there is little to be gained by extending the exposure period if the structure to be fumigated has not been carefully sealed or if the distribution of gas is poor and insects are not subjected to lethal concentrations of hydrogen phosphide. Careful sealing is required to ensure that adequate gas levels are retained and proper application procedures must be followed to provide satisfactory distribution of hydrogen phosphide gas. Some structures can only be treated when completely tarped, while others cannot be properly sealed by any means and should not be fumigated. Exposure times must be lengthened to allow for penetration of gas throughout the commodity when fumigant is not uniformly added to the mass, for example, by surface application or shallow probing. This is particularly important in the fumigation of bulk commodity contained in large storages.

Remember, exposure periods in the table are minimum periods and may not be adequate to control all stored products pests under all conditions nor will they always provide for total reaction of TRI-TOX, particularly if temperatures and commodity moisture levels or humidity are low during the fumigation.

D. Commodities Which May be Fumigated with TRI-TOX

TRI-TOX may be used for the fumigation of listed raw agricultural commodities, animal feed and feed ingredients, processed foods, tobacco and certain other non-food items.

1. Raw Agricultural Commodities, Animal Feed and Feed Ingredients

TRI-TOX tablets and/or pellets may be added directly to animal feed, feed ingredients and raw agricultural commodities stored in bulk. For these commodities not stored in bulk, TRI-TOX may be placed in moisture permeable envelopes, on trays, in bags, etc. and fumigated as with processed foods.

Raw Agricultural Commodities and Animal Feed and Feed Ingredients Which May be Fumigated with TRI-TOX

Almonds	Filberts	Rye
Animal Feed	Flower Seeds	Safflower Seeds
Barley	Grass Seeds	Seed & Pod Vegetables
Brazil Nuts	Legumes	Sesame Seeds
Cashews	Millet	Sorghum
Cocoa Beans	Oats	Soybeans
Coffee Beans	Peanuts	Sunflower Seeds
Corn	Pecans	Triticale
Cottonseed	Pistachio Nuts	Vegetable Seeds
Dates	Popcorn	Walnuts
	Rice	Wheat

2. Processed Foods

The listed processed foods may be fumigated with TRI-TOX. Under no condition shall any processed food or bagged commodity come in contact with TRI-TOX tablets, pellets, or residual dust except that TRI-TOX may be added directly to processed brewer's rice, malt and corn grits for use in the manufacture of beer.

Processed Foods Which May be Fumigated with TRI-TOX

- Processed candy and sugar
- Cereal flours and bakery mixes
- Cereal foods (including cookies, crackers, macaroni, noodles, pasta, pretzels, snack foods and spaghetti)
- Processed cereals (including milled fractions and packaged cereals)
- Cheese and cheese by-products
- Chocolate & chocolate products (assorted chocolate, chocolate liquor, cocoa, cocoa powder, dark chocolate coating and milk chocolate)
- Processed coffee
- Corn grits
- Cured, dried and processed meat products and dried fish
- Dates and figs
- Dried eggs and egg yolk solids
- Dried milk, dried powdered milk, non-dairy creamers, and nonfat dried milk
- Dried or dehydrated fruits (apples, dates, figs, peaches, pears, prunes, raisins and sultanas)
- Processed herbs, spices, seasonings and condiments
- Malt
- Processed nuts (almond, apricot kernels, Brazil nuts, cashews, filberts, peanuts, pecans, pistachio nuts, and walnuts)
- Processed oats (including oatmeal)
- Rice (brewers rice, grits, enriched and polished wild rice)
- Processed tea
- Dried and dehydrated vegetables (beans, carrots, lentils, peas, potato products and spinach)
- Yeast (including primary yeast)

3. Nonfood commodities, including Tobacco

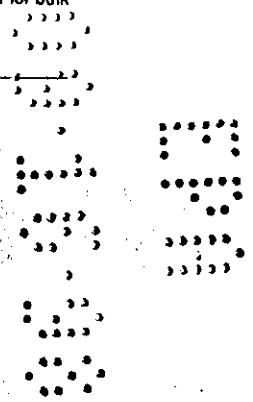
The listed nonfood items may be fumigated with TRI-TOX. Tobacco and certain other of the nonfood commodities should not be contacted by tablets, pellets, or residual dust.

4. Nonfood commodities which may be fumigated with TRI-TOX

- Processed or unprocessed cotton, wool and other natural fibers of cloth, clothing
- Straw and hay
- Feathers
- Human hair, rubberized hair, vulcanized hair, mohair
- Leather products, animal hides and furs
- Tobacco
- Wood, cut trees, wood chips and wood and bamboo products
- Paper and paper products
- Dried plants and flowers
- Seeds, (grass seed, ornamental herbaceous plant seed and vegetable seed)

E. Recommended Dosages

Hydrogen phosphide is a mobile gas that will penetrate to all parts of the storage structure. Therefore, dosage must be based upon the total volume of the space being treated and not on the amount of commodity it contains. The same amount of TRI-TOX is required to treat a 30,000 bushel silo whether it is empty or full of grain unless, of course, the surface of the commodity is sealed off by a tarpaulin. The following dosage ranges are recommended for bulk and space fumigations:



Dosage Guidelines for Fumigations with TRI-TOX

Product	per 1000 cu. ft.*	per 1000 bu.*
Pellets	100-725	120-900
Tablets	20-145	25-180

*Dosage range for dates, nuts & dried fruits is 100-200 pellets, 20-40 tablets, 125-250 pellets, 25-50 tablets.

These dosages are not to be exceeded. It is important to be aware that a shortened exposure period cannot be fully compensated for with an increased dosage of hydrogen phosphide.

The wide range of dosages listed above is required to handle the variety of fumigation situations encountered in practice. Somewhat higher dosages are usually recommended under cooler, drier conditions or where exposure periods are relatively short.

However, the major factor in selection of dosage is the ability of the structure to hold hydrogen phosphide gas during the fumigation. A good illustration of this point is comparison of the low dosages required to treat modern, well-sealed warehouses with the higher range used for poorly constructed buildings that cannot be sealed adequately. In certain other fumigations, proper distribution of lethal concentrations of gas to reach all parts of the structure becomes a very important factor in dose selection. An example where they may occur is in the treatment of grain stored in tall silos. Poor gas distribution frequently results when the fumigant cannot be uniformly added to the grain and it must be treated by surface application.

Although it is permissible to choose from the full range of dosages listed above, the following dosages are recommended for the various types of fumigations:

Recommended TRI-TOX Dosages for Various Types of Fumigations

Type of Fumigation	Pellets	Tablets
1. Space		
Mills, Warehouses, etc.	100-300/1000 cu. ft.	20-60/1000 cu. ft.
Bagged Commodities	150-300/1000 cu. ft.	30-60/1000 cu. ft.
Processed Fruits & Nuts	100-200/1000 cu. ft.	20-40/1000 cu. ft.
Stored Tobacco	100-200/1000 cu. ft.	20-40/1000 cu. ft.
Bulk Stored Commodities		
Vertical Storages	150-300/1000 cu. ft. 200-375/1000 BU	30-70/1000 cu. ft. 40-75/1000 BU
Tanks	150-350/1000 cu. ft. 200-450/1000 BU	30-60/1000 cu. ft. 40-90/1000 BU
Flat Storages	250-725/1000 cu. ft. 300-300/1000 BU	50-145/1000 cu. ft. 60-180/1000 BU
Farm Bins	350-725/1000 cu. ft. 450-300/1000 BU	70-145/1000 cu. ft. 90-180/1000 BU
Bunkers & Tarped Ground Storages	150-400/1000 cu. ft. 200-500/1000 BU	30-80/1000 cu. ft. 40-100/1000 BU
Railcars	150-325/1000 cu. ft. 200-400/1000 BU	30-65/1000 cu. ft. 40-80/1000 BU
Barges	150-400/1000 cu. ft. 200-600/1000 BU	30-80/1000 cu. ft. 40-100/1000 B
Shipholds	150-300/1000 cu. ft. 200-375/1000 BU	30-66/1000 cu. ft. 40-75/1000 BU

Higher dosages are recommended in structures that are of loose construction and in the fumigation of bulk stored commodities in which diffusion will be slowed and result in poor distribution of hydrogen phosphide gas.

F. Application Procedures

1. General Statement

Regardless of the type of storage to be treated, there are several important factors common to all application procedures. A number of these points have been covered in other sections of the Applicator's Manual but are listed again in the following for completeness.

a. A plan should be devised for application, aeration and disposal of the fumigant so as to keep to a minimum any exposures to hydrogen phosphide. See the requirements for Industrial Hygiene Monitoring under the Applicator and Worker Exposure section of this Applicator's Manual.

- b. TRI-TOX tablets and/or pellets should be applied so as to provide effective gas concentrations throughout the storage. When tablets and/or pellets are not applied uniformly to a bulk commodity (surface application in a tall silo or ship's hold for example), exposure times should be lengthened to allow for penetration of gas throughout the storage.
- c. The storage structure should be sealed so as to maintain a suitable gas concentration over the time period required for control of insect pests.
- d. Ideally, exposure periods should be long enough to provide for adequate control of insect pests and also more or less completely react the fumigant.
- e. Piling of large numbers of tablets or pellets, whether applied to a bulk commodity or for space fumigation may prevent complete breakdown of the product by limiting its access to moist air. This can result in decreased efficacy as a result of poor gas release and may leave an active residual for disposal which contains considerable amounts of unreacted aluminum phosphide. Piling of product may also result in increased hazard of fire if water should come into contact with the mass of aluminum phosphide.
- f. Contact with liquid water should be carefully avoided when applying TRI-TOX for treatment of bulk commodities or space.
- g. Aluminum phosphide fumigants should not be applied to confined spaces where the concentration of hydrogen phosphide may build up to exceed its lower flammable limit.
- h. Observe the precautionary and safety statements mentioned in this manual.

The following instructions are intended to provide general guidance for typical fumigations. These instructions are not intended to cover every type of situation nor are they meant to be restrictive. Other procedures may be used if they are safe, effective and consistent with the properties of aluminum phosphide products.

2. Fumigations of Farm Bins

Leakage is the single most important cause of failures in the treatment of farm storages. Since these storages are often small, they usually have a higher leakage area in proportion to their capacity. Most wooden storage structures are so porous that they cannot be successfully fumigated unless they are completely tarped. Do not fumigate storages which will be entered by humans or animals prior to aeration. Do not fumigate areas which house sensitive equipment containing copper or other metals likely to be corroded by hydrogen phosphide gas.

Seal the bin as tightly as possible. It is recommended that the surface of the grain be covered with poly after TRI-TOX has been applied. Tarping the grain surface will greatly reduce the leak rate of the gas as well as reduce the amount of TRI-TOX required. Only the volume below the tarp must be dosed. If not tarped, the entire volume of the storage must be treated, whether full or empty.

TRI-TOX tablets and/or pellets may be scattered over the surface or probed into the grain using a rigid PVC pipe about 5 to 7 feet in length and having a diameter of 1-1/4 inches. Use about 20-50 tablets or 100-250 pellets. Immediately cover the surface of the grain with a plastic tarpaulin. Place no more than 25 percent of the total dose at the bottom if the bin is equipped with aeration fans. Caution: Make sure that the aeration duct is dry before adding TRI-TOX. Addition of TRI-TOX to water in an aeration duct may result in a fire. Seal the aeration fan with 4 mil plastic sheeting.

Post fumigation warning signs on entrances to the bin and near the ladder.

Following aeration of the bin, the surface of the grain may be sprayed with an approved protectant to discourage reinfestation.

3. Fumigation of Flat Storages

a. Establish a plan for application of fumigant to the structure. Treatment of these types of storages may require considerable effort, therefore, sufficient manpower should be available to complete the work rapidly enough to prevent excessive exposure to hydrogen phosphide gas. Vent flasks outside the storage, conduct fumigations during the cooler periods and employ other work practices to minimize exposures. It is often advisable to wear respiratory protection during application of fumigant to flat storages. Refer to the sections on *Applicator and Worker Exposure and Respiratory Protection*.

b. Seal any vents, cracks and other sources of leaks.

c. Apply tablets or pellets by surface application, shallow probing, deep probing or uniform addition as the bin is filled.

Storage requiring more than 24 hours to fill should not be treated by addition of fumigant to the commodity stream as large quantities of hydrogen phosphide may escape before the bin is completely sealed.

Probes should be inserted vertically at intervals along the length and width of the flat storage. Pellets or tablets may be dropped into the probe at intervals as it is withdrawn.

Surface application may be used if the bin can be sufficiently gas tight to contain the fumigant gas long enough for it to penetrate the commodity. In this instance, it is advisable to place about 25 percent of the dosages in the floor level aeration ducts. Check the ducts prior to addition of TRI-TOX to make sure that they contain no liquid water.

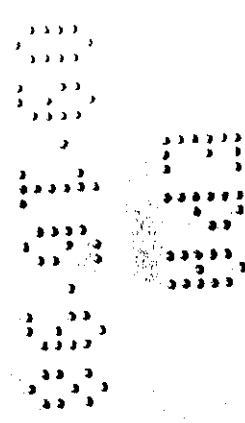
d. Tarping the surface of the commodity is often advisable, particularly if the overhead of the storage cannot be well sealed.

e. Lock all entrances to the storage and post fumigation warning placards.

4. Fumigation of Vertical Storages (concrete upright bins and other silos in which grain can be rapidly transferred).

a. Close all openings and seal all cracks to make the structure as airtight as possible. Prior to the fumigation, seal the vents near the bin top which connects to adjacent bins.

b. Pellets or tablets may be applied continuously by hand or by an automatic dispenser on the headhouse/gallery belt or into the fill opening as the commodity is loaded into the bin. An automatic dispenser may also be used to add TRI-TOX into the commodity stream in the leg of the elevator.



- c. Seal the bin deck openings after the fumigation has been completed
- d. Bins requiring more than 24 hours to fill should not be fumigated by continued addition into the commodity stream. These bins must be fumigated by probing surface application, or other appropriate means. Exposure periods should be lengthened to allow for diffusion of gas to all parts of the bins in which TRI-TOX has not been applied uniformly throughout the commodity mass.
- e. Place warning placards on the discharge gate and on all entrances.

5. Fumigation of Mills, Food Processing Plants and Warehouses

- a. Using the information presented above in this manual, calculate the length of the fumigation and dosage of tablets or pellets to be applied based upon volume of the building, air and/or commodity temperature and the general tightness of the structure.
- b. Carefully seal and placard the space to be fumigated.
- c. Place trays or sheets of Kraft paper or foil, up to 12 sq. ft (1.1 sq. M) in area, on the floor throughout the structure to hold TRI-TOX pellets or tablets. Use total floor space.
- d. Spread TRI-TOX on the sheets at a density no greater than 30 tablets per sq. ft. This corresponds to slightly more than one-half flask of tablets or one-half flask of pellets per 3' x 4' sheet. Check to see that TRI-TOX has not piled up and that it is spread evenly to minimize contact between the individual pellets or tablets.
- e. Doors leading to the fumigated space should be closed, sealed, locked, and placarded with warning signs.
- f. The fumigation period usually lasts from 2 to 5 days, depending upon the temperature. Upon completion of the exposure period, windows, doors, vents, etc. should be opened and the fumigated structure allowed to aerate for at least two hours before entering. When required, gas concentration readings may be taken using low level detector tubes or similar devices to ensure safety of personnel who reenter the treated area. Refer to the section on Applicator and Worker Exposure.
- g. Collect the residual dust and dispose it, with or without further deactivation, following the recommendations given under Disposal Instructions.
- h. Remove fumigation warning placards from the aerated structure.

6. Fumigation of Railcars, Containers, Trucks, Vans and other Transport Vehicles

Railcars, containers, trucks, vans and other transport vehicles loaded with bulk commodities to which TRI-TOX tablets and/or pellets may be added directly are treated in essentially the same way as any other flat storage facility. TRI-TOX may be added as the vehicle is being filled, the dose may be scattered over the surface after loading has been completed or the tablets and/or pellets may be probed below the surface. Carefully seal any vents, cracks, or other leaks, particularly if the fumigation is to be carried out in transit. Remember, railcars and containers shipped piggyback by rail may be fumigated in transit, but it is not legal to move trucks, trailers, vans, etc. over public roads or highways until they are aerated. See Section 6 of this Applicator's Manual for the recommendations on placarding. Notify the consignee if the commodity is to be shipped under fumigation with TRI-TOX. If the consignee is unfamiliar with proper handling of treated railcars, it is recommended that they be provided with the necessary information.

7. Tarpaulin and Bunker Fumigations

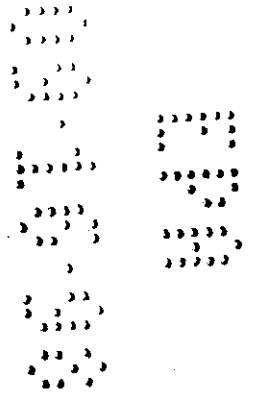
Use of plastic sheeting or tarpaulins to cover commodities is one of the easiest means for providing relatively gas-tight enclosures which are very well suited for fumigation. Poly tarps are penetrated only very slowly by hydrogen phosphide gas, and tight coverings are readily formed from the sheets. The volume of these enclosures may vary widely from a few cubic feet, for example, a fumigation tarpaulin placed over a small stack of bagged commodity, to a plastic bunker storage capable of holding 600,000 bushels of grain or more.

An enclosure suitable for fumigation may be formed by covering bulk or packaged commodity with poly sheeting. The sheets may be tarped together to provide a sufficient width of material to ensure that adequate sealing is obtained. If the flooring upon which the commodity rests is of wood or other porous material, it should be repositioned onto poly prior to covering for fumigation. The plastic covering of the pile may be sealed to the floor using sand or water snakes, by shoveling soil or sand onto the ends of the plastic covering or by other suitable procedures. The poly covering should be reinforced by tape or other means around any sharp corners or edges in the stack so as to reduce the risk of tearing. Thinner poly, about 2 mil., is suitable for most indoor tarp fumigations and for sealing of windows, doors and other openings in structures. However, 4 mil poly or thicker is more suitable for outdoor applications where wind or other mechanical stresses are likely to be encountered.

Tablets and/or pellets may be applied to the tarped stack or bunker storage of bulk commodity through slits in the poly covering. Probing or other means of dosing may be used. Avoid application of large amounts of TRI-TOX at any one point. The TRI-TOX should be added below the surface of the commodity if condensation or other source of moisture is likely to form beneath the poly. The slits in the covering should be carefully taped to prevent loss of gas once the dose has been applied. TRI-TOX tablets and pellets on trays or sheets of Kraft paper may be used for the treatment of bagged commodities and processed foods. Care should be taken to see that the poly is not allowed to cover the TRI-TOX and prevent contact with moist air or confined gas.

Distribution of hydrogen phosphide gas is generally not a problem in the treatment of bagged commodities and processed foods. However, fumigation of larger bunker storages containing bulk commodity will require proper application procedures to obtain adequate results.

Place warning placards at conspicuous locations on the enclosure.



8. Fumigation of Ships

a. General Information

1. IMPORTANT — shipboard, in-transit ship or shiphold fumigation is also governed by U. S. Coast Guard Regulation 46 CFR 147A. Refer to this regulation prior to fumigation.

2. TRI-TOX tablets and pellets are classified by EPA as Restricted Use Pesticides due to the acute inhalation toxicity of hydrogen phosphide (phosphine PH₃) gas. These products are for retail sale to and use only by certified applicators for those uses covered by the applicator's certification or persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of the certified applicator. (Physical presence means on site or on the premises).

Read and follow the label and the Midland Fumigant Co., Inc. Applicator's Manual which contains complete instructions for the safe use of this pesticide.

b. Pre-Voyage Fumigation Procedures

1. Prior to fumigating a vessel for in-transit cargo fumigation, the master of the vessel, or his representative, and the fumigator must determine whether the vessel is suitably designed and configured so as to allow for safe occupancy of the ships crew throughout the duration of the fumigation. If it is determined that the design and configuration of the vessel does not allow safe occupancy by the ships crew throughout the duration of the fumigation, then the vessel will not be fumigated unless all crew members are removed from the vessel. The crew members will not be allowed to reoccupy the vessel until the vessel has been properly aerated and a determination has been made by the master of the vessel and the fumigator that the vessel is safe for occupancy.

2. The person responsible for the fumigation must notify the master of the vessel, or his representative, of the requirements relating to personal protection equipment*, detection equipment, and that a person qualified in the use of this equipment must accompany the vessel with cargo under fumigation. Emergency procedures, cargo ventilation, periodic monitoring and inspections, and first air measures must be discussed with and understood by the master of the vessel or his representative.

*Personal Protection equipment means a NIOSH/MSHA approved respirator or gas mask fitted with an approved canister for phosphine. The canister must be approved for use up to 15 ppm, SCBA or its equivalent must be used above 15 ppm or at unknown concentrations.

3. Seal all openings to the cargo hold or tank and lock or otherwise secure all openings, manways, etc., which might be used to enter the hold. The overspace pressure relief system of each tank aboard tankers must be sealed by closing the appropriate valves and sealing the openings into the overspace with gas-tight materials.

4. Placard all entrances to the treated spaces with fumigation warning signs.

5. If the fumigation is not completed and the vessel aerated before the manned vessel leaves port, the person in charge of the vessel shall ensure that at least two units of personal protection equipment and one gas or vapor detection device, and a person qualified in their operation be on board the vessel during the voyage.

6. During the fumigation or until a manned vessel leaves port or the cargo aerated, the person in charge of the fumigation shall ensure that a qualified person using gas or vapor detection equipment tests spaces adjacent to spaces containing fumigated cargo and all regularly occupied spaces for fumigant leakage. If leakage of the fumigant is detected, the person in charge of the fumigation shall take action to correct the leakage, or shall inform the master of the vessel, or his representative of the leakage so that corrective action can be taken.

7. Review with the master of the vessel or his representative, the precautions and procedures for during the voyage.

c. Application Procedures for Bulk Dry Cargo Vessels and Tankers

1. Apply tablets or pellets by scattering uniformly over the commodity surface. Alternatively, tablets or pellets may be deep- or shallow-probed into the commodity mass.

2. Immediately after application of the fumigant, close and secure all hatch covers, tank tops, battenworth valves, manways, etc.

d. In Transit Fumigation of Containers Aboard Ships

In transit fumigations of containers on ships is also governed by U. S. Coast Guard Regulation 46 CFR 147A as modified by U. S. Coast Guard Special Permit 52-75. This permit, which must be obtained prior to the fumigation is available from: U. S. Coast Guard, Hazardous Materials Branch, MTH-1, Washington, D. C. 20593-0001.

Application procedures for fumigation of raw commodities or processed foods in containers and other transport vehicles are described in Section 3a.

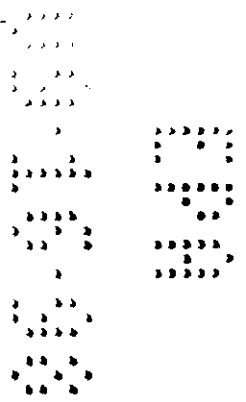
e. Precautions and Procedures During Voyage

1. Using appropriate gas detection equipment, monitor spaces adjacent to areas containing fumigated cargo and all regularly occupied areas for fumigant leakage. If leakage is detected, the area should be evacuated of all personnel, ventilated, and action taken to correct the leakage before allowing the area to be occupied.

2. Do not enter fumigated areas except under emergency conditions. If necessary to enter a fumigated area, appropriate personal protection equipment must be used. Never enter fumigated areas alone. At least one other person, wearing personal protection equipment should be available to assist in case of an emergency.

f. Precautions and Procedures During Discharge

1. If necessary to enter holds prior to discharge, test spaces directly above grain surface for fumigant concentration, using appropriate gas detection and personal safety equipment. Do not allow entry to fumigant areas without personal safety equipment, unless fumigant concentrations are at safe levels, as indicated by a suitable detector.



9. Fumigation of Barges

Barge fumigations are also regulated by U. S. Coast Guard regulation 46 CFR 147A as modified by U. S. Coast Guard Special Permit 2-75. This permit, which must be obtained prior to the fumigation, is available from: U. S. Coast Guard, Hazardous Materials Branch, MTH-1, Washington, D. C. 20593-001

Leaks are a common cause of failures in the treatment of commodities aboard barges. Carefully inspect all hatch covers prior to application of TRI-TOX and seal, if necessary. Notify consignee if the barge is to be fumigated in transit.

10. Fumigations in Small Sealable Enclosures

Excellent results may be attained in the treatment of small enclosures since it is often possible to control the fumigation and also to make the enclosure virtually gas tight. Take care not to overdose during these fumigations. A single pellet will treat a space from 1.4 to 10 cubic feet. From 6.9 to 50 cubic feet may be fumigated with a single TRI-TOX tablet.

11. Treatment of Beehives, Supers and other Beekeeping Equipment

TRI-TOX tablets and/or pellets may be used for the control of the greater wax moth in stored beehives, supers and other beekeeping equipment and for the destruction of bees, Africanized bees, and diseased bees including those infested with tracheal mites and foulbrood. The recommended dosage for this use is 30-45 tablets, 150-225 pellets.

Fumigations may be performed in chambers at atmospheric pressure, under tarpaulins, etc. by placing the tablets or pellets on trays or in moisture permeable envelopes. Do not add more than 2 tablets or 10 pellets to each envelope. Honey from treated hives or supers may only be used for bee food.

12. Burrowing Pest Control

a. Environmental Hazards. This product is very highly toxic to wildlife. Non-target organisms exposed to phosphine gas in burrows will be killed. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning equipment or disposal of waste.

b. Directions for Use

Use Restrictions: This product may be applied to underground burrow systems located in non-crop areas, crop areas, or orchards, and occupied by woodchucks, yellowbelly marmots (rockchucks), prairie dogs (except Utah prairie dogs, *Cynomys parvidens*), Norway rats, roof rats, house mice, ground squirrels, moles, voles, pocket gophers, or chipmunks. All treatments for control of these species in burrows must be made outdoors. Pellets or tablets must be applied directly to underground burrow systems. Do not use within 15 feet (5 meters) of inhabited structures. Do not apply any aluminum phosphide product to any burrow system which might open into or under occupied buildings. Consult Local, State, and Federal Game Authorities to ensure that endangered species do not inhabit the area proposed for treatment. Refer to the "Endangered Species" text below.

c. Application Directions: Use application procedures appropriate to the type of burrow system being treated.

For species with open burrow systems, locate all entrances to each burrow system. Seal all but one entrance to the burrow system tightly by shoveling and packing soil and/or sod to completely seal the opening. Insert 2 to 4 tablets or 10 to 20 pellets into each entrance to be treated. Use the lower rates for smaller burrows and/or when soil moisture is high. Use the higher rates for larger burrow systems and when soil moisture is relatively low. Pack the treated entrance with crumpled paper and shovel soil to completely cover the paper. Using crumpled paper will prevent soil from covering the tablets or pellets and slowing down their action. Inspect treated areas 1 or 2 days following treatment for signs of residual activity of target species. Treat all re-opened or previously undiscovered burrows in the manner prescribed above.

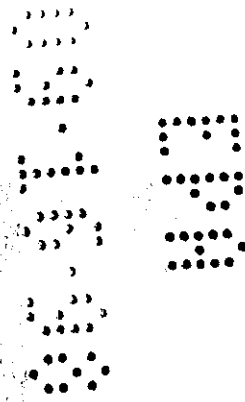
For species with closed burrow systems (pocket gophers, and moles in some situations), locate the main underground runway by probing with a smooth-sided rod 12 to 18 inches from a fresh mound. For pocket gophers, begin probing on the flat side of the mound. A sudden reduction in soil resistance to the probe indicates that the main runway has been located. Once the main runway is located, remove the probe and apply 2 to 4 tablets or 10 to 20 pellets through the probe hole. Adjust treatment rate according to the level of soil moisture, using more pellets or tablets if the soil is relatively dry. Do not treat if soil is extremely dry or if there are no signs of recent gopher or mole activity. Make a tight seal to close probe hole by using a clod of soil or a sod plug to cover the hole or by using the heel of your shoe to push sod and/or soil over the surface opening. If the probe hole is more than one inch in diameter, place crumpled paper in the hole before closing it with soil and/or sod. Two days after treatment, check area for residual pest activity by poking holes in main runways of burrow systems. Flag holes and inspect them two days later. Retreat all re-closed systems on both sides of the plug.

d. Endangered Species Considerations

The use of TRI-TOX in a manner that may kill or otherwise harm an endangered or threatened species or adversely modify their habitat is a violation of Federal laws. The use of this product is controlled to prevent death or harm to endangered or threatened species that occur in the following counties or elsewhere in their range. Use of this product in the areas listed below are prohibited without first contacting and obtaining permission from the Endangered Species Specialist at the nearest regional offices of the U. S. Fish and Wildlife Service (FWS).

Areas Inhabited by Endangered or Threatened Species

1. Black-footed Ferret — States of Arizona, Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah and Wyoming.
2. Blunt-nosed Leopard Lizard — Counties of Kern, Kings, Fresno, Madera, Merced and Tulare in the State of California.
3. Desert Tortoise — Washington County in the State of Utah.
4. Eastern Indigo Snake — States of Florida and Georgia.
5. San Joaquin Kit Fox — Counties of Kern, Kings, Fresno, Merced, Monterey, San Benito, San Luis Obispo, Santa Barbara, Tulare and Ventura in the State of California.



e. Special Local Restrictions

1. North Carolina: TRI-TOX tablets and/or pellets may only be used for control of rats and mice in the State of North Carolina. Use against other burrowing pests is not permitted.
2. Oklahoma: A special permit for black-tailed prairie dog control by poisoning is required in Oklahoma. Contact the Oklahoma State Department of Wildlife Conservation to obtain this permit.
3. Wisconsin: A state permit is required for use of pesticides in Wisconsin to control small mammals, except rats or mice. Please contact your local Department of Natural Resources office for information.
4. Indiana: Use of TRI-TOX tablets and/or pellets for mole control is not legal in the State of Indiana.
5. Missouri: A state permit is required for use of pesticide in Missouri to control small mammals, except rats and mice. Please contact the Missouri Department of conservation office for information.
6. Kansas: A special permit for black-tailed prairie dog control by poisoning is required in Kansas. Contact the Kansas Fish and Game Commission to obtain this permit.
7. California: Use of TRI-TOX tablets and/or pellets for chipmunk control is not legal in the State of California.

SECTION 4
PROTECTIVE CLOTHING

Wear dry gloves of cotton or other material if contact with TRI-TOX tablets or pellets is likely. Wash hands thoroughly after handling aluminum phosphide products. Aerate used gloves and other contaminated clothing in a well ventilated area prior to laundering.

SECTION 5
RESPIRATORY PROTECTION

A. When Respiratory Protection Must Be Worn

NIOSH/MSHA approved respiratory protection must be worn if worker exposure limits cannot be met through controls (such as forced air ventilation) and/or worker practices. Respiratory protection is required if exposure is likely to exceed the TWA of 0.3 ppm during application, or a 0.3 ppm ceiling at any time afterwards. For example, respiratory protection is required to be worn upon reentry into a partially aerated structure if the hydrogen phosphide concentration is above 0.3 ppm. When required, gas concentration measurements for safety purposes may be made using low level detector tubes. See the section on Applicator and Worker Exposure for Monitoring requirements. Information on hydrogen phosphide (phosphine, PH₃) detector tubes may be obtained from: Midland Fumigant Co., Inc., 1805 S. 2nd St., Leavenworth, KS 66048.

B. Permissible Gas Concentration Ranges for Respiratory Protection Devices

A NIOSH/MSHA approved, full-faced mask with hydrogen phosphide canister combination may be used at levels up to 15 ppm or to escape from levels up to 1500 ppm. Gas levels above 1500 ppm, or in situations where the hydrogen phosphide concentration is unknown, a NIOSH/MSHA approved, self-contained breathing apparatus (SCBA) or its equivalent must be used. The NIOSH/MSHA Pocket Guide, 8085 DHEW/NIOSH 78-210, lists these and other types of approved respirators and the concentration limits at which they may be used.

C. Requirements for Availability of Respiratory Protection

If TRI-TOX is to be applied from within the structure to be fumigated, an approved full-face gas mask — phosphine canister combination or self-contained breathing apparatus (SCBA) or its equivalent must be available at the site of application in case it is needed. In addition, SCBA or its equivalent must be available locally, for example, at fire station or rescue if it is not available at the fumigation site.

Respiratory protection need not be available for applications from outside the area to be fumigated such as addition of tablets or pellets to automatic dispensing devices, outdoor applications, etc. if exposures above the permitted exposure limits will not be encountered.

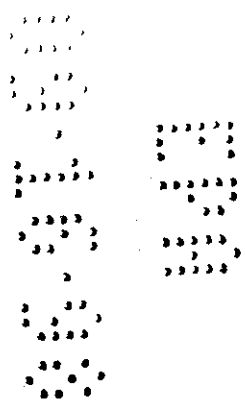
If monitoring equipment is not available on a farm and application of fumigant cannot be made from outside the structure, an approved canister respirator must be worn during application from within the structure being treated.

SECTION 5
PLACARDING OF FUMIGATED AREAS

The applicator must placard or post all entrances to the structure under fumigation with signs bearing, in English and Spanish:

1. The signal word DANGER/PELIGRO and the SKULL AND CROSSBONES symbols in red.
2. The statement: "Area and/or commodity under fumigation, DO NOT ENTER/NO ENTRE."
3. The statement, "This placard may only be removed after the fumigated area is aerated down to 0.3 ppm hydrogen phosphide or below. Transfer of incompletely aerated commodity to a new site is permissible provided that the new storage is placarded if it contains more than 0.3 ppm. Workers must not be exposed to more than 0.3 ppm hydrogen phosphide."
4. The date and time that fumigation begins and is completed.
5. Name of fumigant used.
6. Name, address and telephone number of the applicator.

All entrances to a fumigated area must be placarded. Where possible, placards should be placed in advance of the fumigation to keep unauthorized persons away. For railroad hopper cars, placards must be placed on both sides of the car near the ladders and next to the top hatches into which the fumigant is introduced.



Do not remove placards until the treated commodity is aerated down to 0.3 ppm hydrogen phosphide or less. To determine whether aeration is complete, each fumigated site or vehicle must be monitored and shown to contain 0.3 ppm or less hydrogen phosphide gas in the air space around and, if feasible, in the mass of the commodity. Transfer or incompletely aerated commodity to a new site is permissible. However, the new storage must be placarded if it contains more than 0.3 ppm hydrogen phosphide. Workers who handle incompletely aerated commodity must be informed and appropriate measures taken (i. e., ventilation or respiratory protection) to prevent exposures from exceeding 0.3 ppm hydrogen phosphide.

It is recommended that the persons responsible for removing placards be familiar with physical, chemical and toxicological properties of hydrogen phosphide. They should also be knowledgeable in making gas concentration measurements, exposure limits and symptoms and first aid treatment for hydrogen phosphide poisoning.

SECTION 7

A. Foods and Feeds

Tolerances for hydrogen phosphide residues have been established at 0.1 ppm for animal feeds and 0.01 ppm for finished foods. To guarantee compliance with these tolerances, it is necessary to aerate these commodities for 48 hours prior to offering to the end use consumer.

B. Tobacco

Tobacco must be aerated for at least three days (72 hours) when fumigated in hogshead and for at least two days (48 hours) when fumigated in other containers. Tobacco fumigated in containers with plastic liners will probably require longer aeration periods to reach 0.3 ppm.

SECTION 8

A. Hydrogen Phosphide Exposure Limits

Exposure to hydrogen phosphide may not exceed 0.3 ppm measured as an eight-hour time-weighted average (TWA), for applicators and workers during application. Application is defined as the time period covering the opening of the first containers, applying the appropriate dosage of fumigant and closing up the site to be fumigated. All persons in the treated site and in adjacent indoor areas are covered by its exposure standard.

After application, exposure for any person may not exceed a 0.3 ppm ceiling for hydrogen phosphide. Such exposures may occur if the commodity or space under fumigation leaks, when treated commodity is transferred or handled, if an unaerated or partially aerated space is entered, etc.

B. Application of Fumigant

Depending upon temperature and humidity, TRI-TOX tablets and pellets release hydrogen phosphide gas slowly upon exposure to moisture from the air. In most cases, this release is slow enough to permit applicators to deposit fumigant in the desired areas and then vacate the premises without significant exposure to the gas. Fumigators must wear approved respiratory protection if exposure is likely to exceed the eight-hour TWA of 0.3 ppm. When required, gas concentration measurements for safety purposes may be made using low level detector tubes. See the write-up below on Industrial Hygiene Monitoring. Information on hydrogen phosphide (phosphine PH₃) detector tubes may be obtained from: Midland Fumigant Co., Inc., 1805 S. 2nd St., Leavenworth, KS 66048.

It is often advisable to use respiratory protection during application of fumigant under hot and humid conditions, particularly when considerable time must be spent inside the structure being treated.

C. Leakage from Fumigated Sites

Hydrogen phosphide is highly mobile and given enough time may penetrate seemingly gas tight materials such as concrete and cinder blocks. Therefore, adjacent, enclosed areas likely to be occupied should be examined to ensure that significant leakage has not occurred. Sealing of the fumigated site and/or air flow into the occupied areas must be sufficient to meet exposure standards.

D. Aeration and Reentry

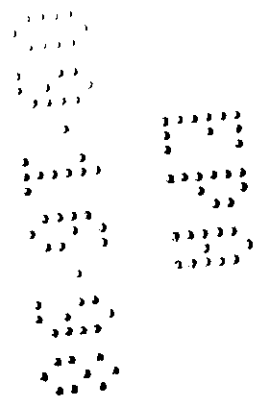
If the area is to be entered after fumigation, it must be aerated until the level of hydrogen phosphide gas is 0.3 ppm or below. The area or site must be monitored to ensure that liberation of gas from the treated commodity does not result in the development of unacceptable levels of hydrogen phosphide. Do not allow reentry into treated areas by any persons before this time unless protected by an approved respirator.

E. Handling Unaerated Commodities

Workers must not be exposed to hydrogen phosphide in excess of 0.3 ppm during moving, storage or processing of incompletely aerated commodities.

F. Industrial Hygiene Monitoring

It is recommended that hydrogen phosphide exposures be documented in an operations log or manual for each site and operation where exposure may occur. The purpose of monitoring is to prevent excessive exposures and to determine when and where respiratory protection is required. Once exposures have been adequately characterized, subsequent monitoring is not routinely required. However, spot checks should be made occasionally, especially if conditions change significantly or an unexpected garlic odor is detected. Gas measurements should be made in the workers' breathing zone. Monitoring is not required for outdoor operations.



If monitoring shows that workers are exposed to concentrations in excess of the permitted limits, then engineering controls (such as forced air ventilation) and/or appropriate work practices should be used where possible to reduce exposure to within permitted limits.

There are a number of devices on the market for measurement of hydrogen phosphide gas levels for industrial hygiene purposes. One of these is the hydrogen sampling pump. These devices are reliable, portable, simple to use, do not require extensive training, and provide relatively rapid, inexpensive, and accurate low-level industrial hygiene monitoring.

**SECTION 9
STORAGE INSTRUCTIONS**

Store TRI-TOX under lock and key, in a dry, well-ventilated area away from heat. Post as pesticide storage area. Do not contaminate water, food or feed by storing pesticides in the same areas used to store these commodities.

Do not store in buildings where humans or domestic animals reside. Keep out of reach of children.

TRI-TOX tablets and pellets are supplied in gas tight, resealable aluminum flasks. Do not expose the product to atmospheric moisture any longer than is necessary and seal tightly before returning opened flasks to storage. The shelf life of TRI-TOX is virtually unlimited as long as the containers are tightly sealed.

DISPOSAL INSTRUCTIONS

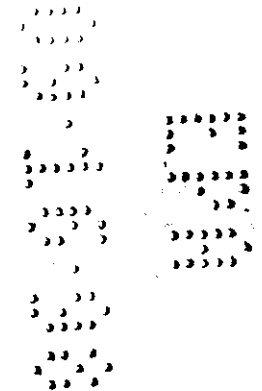
1. Do not contaminate water, food or feed by storage or disposal.
2. Unreacted or partially reacted TRI-TOX is acutely hazardous. Improper disposal of excess pesticides is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. For specific instructions, see Section 11 of this manual, Spill and Leak Procedure.
3. Some local and state waste disposal regulations may vary from the following recommendations. Disposal procedures should be reviewed with appropriate authorities to ensure compliance with local regulations. Contact your state Pesticide or Environmental Control Agency or Hazardous Waste Specialist at the nearest EPA regional Office for guidance.
4. Triple rinse flasks and stoppers with water. 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. Rinsate may be disposed of in a sanitary landfill by pouring it out onto the ground or by other approved procedures. Or, it is permissible to remove lids and expose empty flasks to atmospheric conditions until residue in flasks is reacted, then puncture and dispose of flasks in a sanitary landfill or other approved site, or by other procedures approved by State and local authorities.
If properly exposed, the residual dust remaining after a fumigation with TRI-TOX will be a grayish-white powder containing only a small amount of unreacted aluminum phosphide. However, residual dust — so called "green dust" — from incompletely exposed TRI-TOX will require special care.

B. Directions for Disposal of Residual Dust from TRI-TOX

1. Confinement of partially spent residual dust, as in a closed container, or collection and storage of large quantities of dust may result in a fire hazard. Small amounts of hydrogen phosphide may be given off from unreacted aluminum phosphide, and confinement of the gas may result in a flash.
2. In open areas, small amounts of residual dust, up to about 5 to 8 kg., may be disposed of on site by burial or by spreading over the land surface away from inhabited buildings.
3. Spent residual dust from TRI-TOX may also be collected and disposed of at a sanitary landfill, incinerator or other approved sites or by other procedures approved by Federal, State or Local authorities. "Green Dust" must be further deactivated before disposal at a landfill.
4. From 2 to 3 kg. (4 to 7 lbs) of spent dust from 2 to 3 flasks of TRI-TOX may be collected for disposal in a 1 gallon bucket. Larger amounts, up to about one-half case, may be collected in burlap, cotton or other types of porous cloth bags for transportation in an open vehicle to the disposal site. Do not collect dust from more than 7 flasks of tablets or 10 flasks of pellets (about 11 kg. or 25 lbs) in a single bag. Do not pile cloth bags together. Do not use this method for partially spent or "green dust." Caution: Do not collect dust in large drums, dumpsters, plastic bags or other containers where confinement may occur.

C. Directions for Deactivation of Partially Spent Residual Dust from TRI-TOX.

1. Partially spent dust may be deactivated prior to ultimate disposal. This is especially true in cases of incomplete exposure which has resulted in so-called "green dust" or following a fumigation which has produced large quantities of partially spent material. "Green dust" must be further deactivated prior to disposal in landfills.
2. Residual dust from TRI-TOX may be deactivated as follows using the "Wet Method."
 - a. Deactivating solution is prepared by adding the appropriate amount of low-sudsing detergent or surface active agent to water in a drum or other suitable container. A 2% solution of detergent is suggested. The container should be filled with deactivating solution to within a few inches of the top.
 - b. Residual dust is poured slowly into deactivating solution and stirred so as to thoroughly wet all of the particles. This should be done in the open air and not in the fumigated structure. Dust from TRI-TOX tablets or pellets should be mixed into no less than 10 gallons of water-detergent solution for each case of material used. Wear appropriate respiratory protection during wet deactivation of partially spent dust.
 - c. Dispose of the deactivated dust-water suspension, with or without preliminary decanting, at a sanitary landfill or other suitable site approved by local authorities. Where permissible, the slurry may be poured out onto the ground. If the slurry has been held for 36 hours or more, it may be poured into a storm sewer.
 - d. Caution: Respiratory protection is required during wet deactivation of partially spent material. Do not cover the container at any time. Do not dispose of dust in a toilet. Do not allow quantities of dry residual dust from TRI-TOX to be collected or stored without deactivation.



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3. Residual dust from TRI-TOX may also be deactivated as follows using the "Dry Method."

a. Extension of the fumigation period is the simplest method for further deactivation of "green dust" or partially spent dust prior to ultimate disposal.

b. Small amounts of partially spent dust, from 2 to 3 kg. (4 to 7 lbs) may be further deactivated by storage in a 1 gallon bucket. Larger amounts of dust (about 11 kg. or 25 lbs) may be held for deactivation in porous cloth bags (burlap, cotton, etc.) Caution: Transport these bags in open vehicles, do not pile up bags and do not use this method for "green dust."

**SECTION 11
SPILL AND LEAK PROCEDURE**

A. General Precautions and Directions

A spill other than incidental to application or normal handling, may produce high levels of gas and, therefore, attending personnel must wear SCBA or its equivalent when the concentration of hydrogen phosphide gas is unknown. Other NIOSH/MSHA approved respiratory protection may be worn if the concentration is known. Do not use water at any time to clean up a spill of TRI-TOX. Water in contact with unreacted tablets or pellets will greatly accelerate the production of hydrogen phosphide gas which could result in a toxic and/or fire hazard. Wear cotton gloves or other material when handling aluminum phosphide.

Return all intact aluminum flasks to fiberboard cases or other packaging which has been suitably constructed and marked according to DOT regulations. Notify consignee and shipper of damaged cases.

If aluminum flasks have been punctured or damaged so as to leak, the container may be temporarily repaired with aluminum tape or the TRI-TOX may be transferred from the damaged flask to a sound metal container which should be sealed and properly labeled as aluminum phosphide. Transport the damaged containers to an area suitable for pesticide storage for inspection.

Further instructions and recommendations may be obtained from Midland Fumigant Co., Inc.

If a spill has occurred which is only a few minutes old, collect the tablets and/or pellets and place them back into the original flasks, if they are intact, and stopper tightly. Place the collected tablets and/or pellets in a sound metal container if the original flasks are damaged. Caution: these flasks may flash upon opening at some later time.

If the age of the spill is unknown or if the tablets and/or pellets have been contaminated with soil, debris, water, etc., gather up the spillage and place it into small open bucket having a capacity no larger than about 1 gallon. Do not add more than one flask of spilled material, 1 to 5 kg. (2 to 3 lbs) to the bucket. If on-site, wet deactivation is not feasible, these containers should be transported in open vehicles to a suitable area. Wet deactivation may then be carried out as described in Section 10. Alternatively, small amounts of spillage from 4 to 5 flasks (4 to 8 kg.) (9 to 18 lbs) may be spread out in an open area away from inhabited buildings, and deactivated by atmospheric moisture.

B. Directions for Deactivation by the Wet Method

If the contaminated material is not to be held until completely reacted by exposure to atmospheric moisture, deactivate the product by the Wet Method as follows:

1. Deactivating solution is prepared by adding the appropriate amount of low sudsing detergent or surface active agent to water in a drum or other suitable container. A 2% solution of 4 cups in 30 gallons is suggested. The container should be filled with deactivation solution to within a few inches of the top.

2. The tablets or pellets are poured slowly into the deactivating solution and stirred so as to thoroughly wet all of the TRI-TOX. This should be done in the open air. TRI-TOX tablets or pellets should be mixed with no less than about 15 gallons of water-detergent solution for each case of spent material. Wear appropriate respiratory protection during wet deactivation.

3. Allow the mixture to stand, with occasional stirring, for about 36 hours. The resultant slurry will then be safe to dispose of.

4. Dispose of the slurry of deactivated material, with or without preliminary decanting, at a sanitary landfill or other suitable site approved by local authorities. Where permissible, this slurry may be poured into a storm sewer or out onto the ground.

5. Caution: Respiratory protection is required during wet deactivation of unexposed TRI-TOX. Never place pellets or tablets in a closed container such as a dumpster, sealed drum, plastic bag, etc. as flammable concentrations and a flash of hydrogen phosphide gas is likely to develop.

6. The EPA has determined that proper disposal of aluminum phosphide will cause no unreasonable effects to the environment.

FOR ASSISTANCE, CONTACT:

**Midland Fumigant Co., Inc.
1805 S. 2nd St.
Leavenworth, KS 66048
(800) 332-3930
(913) 651-3900**

TRI-TOX Pellets EPA Reg. No. 30574-7
TRI-TOX Tablets EPA Reg. No. 30574-8

