

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PM32
43568-1
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MAR 26 1990

Jody A. Fox
Phos-Fume Chemical Company
12703 W. 117th Street
Overland Park, KS 66210

Subject: Product Name: Quick Phos Aluminum Phosphide Fumigant Pellets
EPA Registration No.: 43568-1
Your Amendment Dated December 13, 1989

Dear Ms. Fox:

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

Each comment below concerns the Environmental Hazards section of the product label.

1. Expand the sentence, "This product is toxic to fish and wildlife" to read, "This product is very highly toxic to fish and wildlife."
2. Add the sentence, "Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes)," to the Environmental Hazards section.

CONCURRENCES

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3. Add the sentence, "Do not contaminate water by cleaning of equipment or disposal of wastes," to the Environmental Hazards section.

If you have any questions, you may call Robert Travaglini on (703) 557-6909.

Sincerely,



Walter C. Francis
Acting Product Manager (PM-32)
Antimicrobial Program Branch
Registration Division (H-7504C)

Enclosure

BEST AVAILABLE COPY

**PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
KEEP OUT OF REACH OF CHILDREN
DANGER - POISON**

Aluminum phosphide powder, pellets 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 garlick 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 garlick 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 powder, pellets or tablets react with moisture in the air, acids, and many other liquids to release phosphine gas. Inhaled exposure by inhalation causes malaise, ringing of ears, fatigue, nausea and pressure in the chest which is relieved by removal to fresh air.

Moderate poisoning causes weakness, vomiting, epigastric pain, chest pain, diarrhea and dyspnea. Severe poisoning may occur in a few hours to several days, resulting in pulmonary edema and may lead to dizziness, cyanosis, unconsciousness and 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 anemia. Pathology is characteristic of hypoxia. Frequent exposure over a period of days or weeks may cause poisoning. Treatment is symptomatic.

PHYSICAL/CHEMICAL HAZARDS

Aluminum phosphide in tablets, pellets, bags 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, pellets, bags 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 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, low-voltage temperature monitoring systems, switching gears, communication devices, computers, calculators 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 organic pigments, etc. should not be exposed.

STORAGE AND HANDLING

Store in a dry, well-ventilated area away from heat, under lock and key. Post as a restricted 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, packaging intended for retailers.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic life. Target organisms exposed to phosphine gas will die. For conservative 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, packaging intended for retailers.

**RESTRICTED USE PESTICIDE
DUE TO ACUTE INHALATION TOXICITY OF HIGHLY TOXIC
PHOSPHINE GAS**

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 attached product 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 Quick Phos product manual which contains complete instructions for the safe use of this pesticide.

QUICK-PHOS

ALUMINUM PHOSPHIDE FUMIGANT PELLETS

A fumigant for use against listed insects which infest listed raw Agriculture Commodities, Specified Processed Foods and Animal Feeds. (See Product Manual)

ACTIVE INGREDIENT:	Aluminum Phosphide	60%
INERT INGREDIENTS:		40%
	Total	100%

Contents 1,660 x 6/10 Grams
Total Net Weight 22 Lbs

**KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO - POISON**

PRECAUCION AL USUARIO: Se usará solo en insectos, no se este producto hasta que la etiqueta se le haya sido explicado completamente.

PRACTICAL TREATMENT STATEMENT

Symptoms of overexposure to phosphine 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 from aluminum or magnesium 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 and unconscious person.

If aluminum or magnesium phosphide powder, granules, pellets or tablets are swallowed, drink or pour into glasses of water and induce vomiting by touching back of throat with finger. Do not give anything by mouth if victim is unconscious or not alert. If pellets of aluminum or magnesium 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 wearing. Wash contaminated bare skin thoroughly with soap and water. If in eyes, flush with water. Get medical attention.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG NO 43568-1

EPA EST NO 59061 MX 1
EPA EST NO 37404 1Y 02
EPA EST NO 41878 1Y 1
EPA EST NO 43743 BR 01
EPA EST NO 40060 CT 04

Midland Fumigants, Inc. / Subsidiary Company of MIDLAND FUMIGANTS INC

1805 South 2nd Street
Leavenworth, Kansas 66048
43568-1

DIRE

It is a violation of Federal Law to use this fumigant in a highly hazardous manner. Before using, read and follow all precautions. Product Manual for Quick Phos, Applicator Fumigants Inc, 1805 South 2nd, Leavenworth, Kansas 66048.

SPILL AND

A spill, other than incidental to application, therefore attending personnel must wear protective clothing. If any spill is known, do not use when at any time in unreacted tablets, pellets, or bags will give a toxic and/or fire hazard. Wear cotton clothing. Return all intact cans to cardboard cases according to DOT regulations. Notify carrier if cans have been punctured or damaged. aluminum tape or the aluminum phosphide container which should be sealed and placed in a safe container for possible disposal. May be obtained, a request from MESA.

STORA

STORAGE: STORE IN A DRY, WELL VENTILATED AREA AS A PESTICIDE STORAGE. STORE PESTICIDES IN THE SAME ROOMS. DO NOT STORE IN BUILDINGS. ALUMINUM PHOSPHIDE PRODUCTS SHALL NOT BE STORED IN RETAILERS.

DISPOSAL OF UNREACTED TABLETS, PELLETS, OR BAGS: UNREACTED OR PARTIALLY REACTED TABLETS, PELLETS, OR BAGS SHALL BE DISPOSED OF EXCESS PESTICIDE, SPRAYED OR BURNED IN ACCORDANCE WITH STATE INSTRUCTIONS. CONTACT YOUR STATE DEPARTMENT OF AGRICULTURE FOR DISPOSAL PROCEDURES.

DISPOSAL OF EMPTY CANS: OTHER APPROVED STATE OR LOCAL DISPOSAL PROCEDURES. CONTACT FEDERAL STATE DEPARTMENT OF AGRICULTURE FOR APPROVAL OF PROCEDURES OTHER THAN BURNING.

IF DOUBT EXISTS AS TO WHETHER TO BURN: CONTACT MIDLAND FUMIGANTS INC.

SEE PRODUCT MANUAL

Seller does not make warranties expressed or implied on the label. Customer assumes all risks in use.