FEB 1 8 1892

Phos-Fume Chemical Co., Inc. A Subsidiary of Midland Fumigants, Inc. 1805 South Second Street Leavenworth, KS 66048

Attn: Jody A. Fox

Subject: Fumiphos 60% Aluminum Phosphide Pellets EPA Registration No. 43568-1

Your Application of November 18, 1991

Your recent submission concerning a proposed name change for the subject product and revised labeling has been reviewed, please note the following.

- The proposed product name change from "Quick Phos Aluminum Phosphide Pellets" to "Fumiphos 60% Aluminum Phosphide Pellets" is acceptable.
- The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.
- The applicator's manual accompanying this submission, which is considered part of the product labeling is also acceptable. A stamped copy is enclosed for your records.
- The Confidential Statement of Formula enclosed with this submission, revised to reflect the name change, agrees with the label, and has been included in your product's confidential file.

Sincerely,

Ruth G. Douglas Product Manager (32)

Antimicrobial Program Branch Registration Division (H7504C)

CONCURRENCES						
SYMBOL						
SURNAME	<b> </b>	}				
DATE   1994						
EPA Form 1320-1 (12.70)	/tv		EFICIAL EN E CORY			

HS GOVERNMENT PRINTING (FIRE 1991 0-467 97)

Printed on Recycled Paper

OFFICIAL FILE COPY

# ACCEPTED

FEB 1 8 1992

Charles to the man insection, and price and Reducestable day, an assessment, for the resolution registered under E. Bog. No. 43568-/

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

DANGER - POISON

Aluminum phosphide powder, granules, or peliets may be fatal if swallowed. Do not get in eyes, on skin, or on clothurg. Do not set, drank, or emole while handling aluminum phosphide furnigants. If a seased container is opened, or if the material comes in contact with moisture, water, or acids, extremely toxic phosphine gas will be nelimined. If a garlic oder 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, nr-entry, and disposel procedures specified elsewhere in the labeling to prevent overexposure.

NOTE TO PHYSIGIAN: Aluminum phosphide granules, powder, or peliets react with moisture in the air, acids, and many other founds to release phosphine gas. Mell exposure by inhalation causes malaise, integing of ears, falique, nessel, and pressure in the chest which is releved by removal to fresh air.

Moderate poisoning causes weakness, vomeing, epigastric pain, cheet pain, diarrhes, and dyspines. Severe poisoning may occur in a few hours to several days, resulting in pulmonary ocens, and may lead to duziness, cyanosa, unconsciousness, and death. In sufficient quantity, phosphine affects the liver, fundeys, lungs, nervous system, and circulatory system inhaution can cause lung and brain symptoms, but daman hemorrhages, and brain eoems. Ingestion cause lung and brain symptoms, but daman hemorrhages, and orac common. Phosphine poisoning may result in (1) pulmonary adama. (2) liver elevated serum GOT LDM and altaine phosphinasiae, reduced prothrombin, hemorrhage and (sunder, and (3) kidney hematuris and anums. Pathology is characteristic of hypoxie.

Frequent exposure over a period of days or weeks may cause poisoning. Treatment is symptomatic.

#### **ENVIRONMENTAL HAZARDS**

This product is very highly toxic to fish and widdle. Non-target organisms exposed to phosphine gas will be killed. Do not apply directly to water or wettands (swemps, bogs, marshes and potholes). Do no contaminate water by cleaning of equamment or disposal of wastes. See Product Manual for additional Environmental Hazards.

#### PHYSICAL/CHEMICAL HAZARDS

Aluminum phosphide in patiesty spent dust will release phosphine gas if exposed to moisture from the air or if it comes into contact with water, acide, and many other fisuide. Pring of petiets 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, were open these containers in a flemmable atmosphere. These precautions will also reduce the applicator's exposure to phosphine rate.

Illimitable atmosphere trace precounting was usered, and only larid a stable of normal furnication temperatures. However, if may react with certain installing cause corrollon, especially at legies temperatures and restrict humbities. Metals such as oppore, brasp, part copper, and precous metals such as gold and salver are susceptible to corrosson by phosphere. Thus, small electric motors, arrolan detectors, brass sprinder heads, betteres and bettery chargers, fork lifes, temperature monotronic systems, swetching gears, communication devices, computers, calculators, or other electrical coupment should be protected or removed before furnigation.

Phosphine gas will also react with causes in netalic setts and, therefore, sensitive items such as photographic film, some morganic pigments, etc., should not be exposed.

STCRAGE AND HANDLING

Store in a dry, well-ventileted area away from heat, under lifet and flay. Post as a pentions storage area, Do not contaminate water, food, or feed by storing pesticides in the seme areas seed to store these commonities. 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.

#### RESTRICTED USE PESTICIDE DUE TO ACUTE INHA! ATION TOXICITY OF HIGHLY TOXIC HOSPHINE GAS

For retail sale to and use on: A Certified Applicators for those uses covered by the Applicator's certification or pa, suns 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 FUMIPHOS Product Manual which contains complete instructions for the safe use of this pesticide.

# **FUMIPHOS 60**9

## ALUMINUM PHOSPHIDE FUMIGANT PELLETS

A funipant for use against listed insects which infest listed raw Agricultural Commodities, Specified Processed Foods, and Animals Feeds. (See Product Manual)

ACTIVE INGREDIENT:

Aluminum Phosphide......60% INERT INGREDIENTS:.....40%

#### KEEP OUT OF REACH OF CHILDREN

DANGER



**PELIGRO** 

#### POISON

PRECAUCION AL USUARIO: Si usted no be ingles, no use este producto hasta que la etiquata se la haya

#### STATEMENT OF PRACTICAL TREATMENT

Symptoms of overexposure to phosphine are headeche, deziness, neutea, difficult breathing, vomiting, diarrhes. In all cases of overexposure get medical allemion immediately. Tale victim to a doctor or emergency treatment facility.

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

person.

IF ALUMINUM PHOSPHIDE POWDER, GRANULES, OR PELLETS ARE SWALLOWED: Drink or administer one or two glasses of water and induce vorming by touching back of throat with finger or, it available, syrup of ipecac. Do not give anything by mouth a victim is unconscisue or not steet, if POWDER, GRANULES, OR PELLETS OF ALUMINUM PHOSPHIDE GET ON SKIN: Study medicinal off ciptings and shoes in a well venticated area. Allow clothes to across in a venticated area prior to isundering. Wash contaminated bure shin thoroughly with soap and water, is a venticated area prior to isundering. IF IN EYES: Plush with plenty of water, Get medical attention.

SEE SIDE PAREL AND PRODUCT MANUAL FOR AGDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 43568-1

EPA EST. NO. 30574-CI-1

Contents: 1660 Pellets - Net Weight: 2.2 lbs. (1 kilo)

Manufactured for:
PHOSFUME CHEMICAL CO.
A Subsidiary Co. of MIDLAND FUMIGANTS INC.
1805 South 2nd Street Leavenworth, Kansas 66048

## DIRE

"It is a violation of Federal Law to us This furnigent is a highly hazardous use. Before using, read and follow Manual. Product Manual for comp South 2nd, Leevenworth, KS 68048

## SPILL AN

A spill, other then incidental to app therefore, attending personnal must gae is unknown. Other BLOSPAISH as known. Do not use water at any with unreacted tablets will greatly a toxic and/or five hazard. Weer collotoxic and/or live nazard. West collo Return all intact cans to cardiocard according to OOT regulations. Note if cans have been punctioned or dan alumnium tape or the alumnium p metal container which should be a damaged container to an area sun recommendations may be obtained

#### STOR

#### STORAGE:

Store in a locked, dry, well ventila contaminate water, food, or fee commodities. Do not store in buil

#### DISPOSAL:

DISPOSAL:
Unreacted or partially reacted at excess peeticale, apray micture, deposed of by use according to Control Agency, or the Hazardo guidance. For specific instruction Some local and state weste disp bisposal procedures should be a local regulations. Contact your Waste Specialist at the nearest Effrigie rines flastes and stoppers and dispose of in a sensitary authorities. Rineste may be dispersionationed, it is also permissible the flaste is macted. Then putch by other procedures approved by if properly exposed, the reactual be grayish-white and contain on from incompletely supposed alar RUMIGANTS INC. Product Manual Participants of the product Manual Product Manual Participants of the product Manual Product Ma

SEE PRODUCT

Seller does not make warranties those directed on the label. Cur contrary to label recommendate

# **BEST AVAILABLE COPY**

APPLICATOR 3 MANUAL



For use against insects which infest stored Commodities and Control of Burrowing Pests

Active ingredient:

Aluminum Phosphide..... Inert Ingredient......40% Total...

ACCEPIED FEB 1 8 1992 Podicional fet as assessed for the THE RESERVE OF THE RE 12 10 43568-12.3

#### KEEP OUT OF REACH OF CHILDREN

#### **DANGER - POISON - PELIGRO**

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

(TO THE USER: If you cannot read English, do not use this product until the label and manual has been fully explained to you.)

#### 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, tablets, or bags are swallowed;

Drink or administer one or two glasses of water and induce vomiting by touching the back of the 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 immediately.

THIS PRODUCT IS ACCOMPANIED BY AN APPROVED LABEL AND APPLICATOR'S MANUAL. READ AND UNDERSTAND THE ENTIRE LABELING, ALL PARTS OF THE LABELING ARE EQUALLY IMPORTANT FOR SAFE AND EFFECTIVE USE OF THIS PRODUCT. CALL MIDLAND FUMIGANTS, OR EPA IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABELING. REFER TO THE APPLICATOR'S MANUAL FOR DETAILED PRECAUTIONS, RECOMMENDATIONS AND DIRECTIONS FOR USE.

#### WARRANTY

Seller warrants that the product conforms to its chemical description and when used according to label directions under normal conditions of use, it is reasonably fit for the purposes stated on the label. Seller makes no other warranty, either express or implied, and buyer assumes all risk should the product be used contrary to label

CLASSIFIED BY UNDERWRITERS LABORATORIES, INC. AS TO FIRE HAZARD ONLY WHEN USED SFECIFI-CALLY AS DIRECTED IN THE MANUFACTURER'S INSTRUCTIONS. FUMIPHOS TABLETS, PELI ETS AND BAGS ARE NONCOMBUSTIBLE, BUT EXPOSURE TO MOIST AIR OR WATER RELEASES FLAMFABLE !.ND TOXIC PHOSPHINE (HYDROGEN PHOSPHIDE) GAS. SPONTANEOUS IGNITION MAY RESULT IF CONTACTED BY WATER, ACIDS, OR CHEMICALS.

1

BEST AVAILABLE COPY

#### **TABLE OF CONTENTS**

#### 1. INTRODUCTION

#### 2. PRECAUTIONARY STATEMENTS

- A, Hazards to Humans and Domestic Animals
- B. Statement of Practical Treatment
- C. Note to Physician
  D. Physical and Chemical Hazards

#### 3. DIRECTIONS FOR USE

- A. General B. Efficacy C. Exposure Conditions
- D. Commodities Which May be Furnigated with
  - **FUMIPHOS**
- E. Recommended Dosages
- F. Application Procedures

#### 4. PROTECTIVE CLOTHING

#### 5. RESPIRATORY PROTECTION

- A. When Respiratory Protection Must be Worn
- 8. Permissible Gas Concentration Ranges for Respiratory Protection Devices
- C. Requirements for Availability of Respiratory Protection.

#### 6. PLACARDING OF FUMIGATED AREAS

#### 7. AERATION OF FUMIGATED COMMODITIES

- A. Foods and Feeds

#### 8. APPLICATORS AND WORKER EXPOSURE

- A. Hydrogen Phosphide Exposure Limits

  B. Application of Furnigant
- C. Leakage from Fumigated Sites
- D. Aeration and Reentry
  E. Handling Unaerated Commodities
- F. Industrial Hygiene Monitoring

#### 9. STORAGE INSTRUCTIONS

#### 10. DISPOSAL INSTRUCTIONS

- B. Directions Disposal of Residual Dust from FUMIPHOS C. Directions for Deactivation of Residual Dust from
- **FUMIPHOS**

## 11. SPILL AND LEAK PROCEDURES

- A. General Precautions and Directions
- B. Directions for Deactivation by the Wet Method

#### **SECTION 1** INTRODUCTION

FUMIPHOS furnigants are used to protect stored commodities from damage by insects and for the control of burrowing pests. Furnigation of stored products with FUMIPHOS in the manner prescribed in the labeling does not contaminate the stored commodity.

FUM:PHOS and other Aluminum Phosphide furnigants are acted upon by atmospheric moisture to produce Hydrogen Phosphide (phosphine, PH3) gas. FUM(PHOS tablets, pellets, and bags contain aluminum phosphide (ALP) as their active ingredient and will liberate hydrogen phosphide via the following chemical reaction:

Hydrogen phosphide gas is highly toxic to insect, 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 Applicators Manual for FUMIPHOS pellets, tablets, and bags.

FUMIPHOS also contains ammonium carbamate which liberates ammonia and carbon dioxide as follows:

NH2COONH4 ---> 2NH3 + CO2

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

FUMIPHOS is prepared in three forms, tablets, pellets, and bags. 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 gram and release 0.2 gram of hydrogen phosphide gas. They are about 16 mm in diameter and are packaged in resealable

The bags weigh 34 grams each and release 11 grams of hydrogen phosphide gas. They are packaged in metal containers of ten or one hundred bags to the container. The bags are packaged in an oxygen free environ-

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

FUMIPHOS pellets, tablets and bags 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. FUMIPHOS bags container cannot be resealed for future use. Storage and handling instructions will be given in detail later in this Applicators Manual.

## A summary of safety recommendations is outlined below:

#### SAFETY RECOMMENDATION SUMMARY

- Carefully read the labeling and follow instructions
- Never furnigate alone from inside the storage structure.
- Person supervising must be a certified fumigator and personnel assisting must be trained in the use of ALP. Never allow uninstructed personnel to handle FUMIPHOS.
- Approved respiratory protection must be available for the furnigation of structures from within. Wear dry gloves of cotton or other material if contact with FUMIPHOS tablets, pellets or bags is likely Aerate used gloves and other contaminated clothing in a well ventilated area prior to laundering. Wash
- hands thoroughly after using FUMIPHOS.

  Open fumigant containers in open air only, Never open in a flammable atmosphere.
- Do not allow FUMIPHOS to contact liquid or pile up.
- Dispose of empty containers and spent residual dust in a manner consistent with the label instructions.
- Post warning placards on fumigated areas.
- Prior to furnigation, 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
- Hydrogen phosphide lumigants are not to be used for vacuum fumigations.
- Exposure to hydrogen phospnide 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.
- Furnigated areas must be aerated to 0.3 ppm hydrogen phosphide or less prior to reentry by unprotected workers.
- Finished foods and feeds that have been furnigated with FUMIPHOS must be aerated for 48 hours prior to offering to the end use consumer.
- Transfer of a treated commodity to another site with-out complete aeration is permissible provided that the new storage site is placarded if its concentration is above 0.3 ppm...
- Keep containers of FUMIPHOS tightly closed except while removing product for application.
- 17. Protect materials containing metals such as copper, silver, gold and their alloys and salts from corrosive exposure to hydrogen phosphide.
- Tablets, pellets and bags must not come in contact with any processed food except that may be added directly to processed brewers nice, mait and com grits used in the manufacture of beer.
- Do not use aluminum phosphide containers for any purpose other than recycling or reconditioning. OSHA recommends preexposure screening of employees to detect impaired pulmonary function. They recommend that any employees developing this condition be referred for medical examination.

#### **SECTION 2** PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Aluminum phosphide from FUMIPHOS tablets, pellets or bags 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, 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 App. —stors Manual for appropriate monitoring procedures. Pure hydrogen phosphide gas is odorless: the garlic odor is due to 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 ebsent. Observe proper reentry procedures specified elsewhere in

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 petiets, tablets or bags 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 atuminum 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, tablets or bags 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 a pellets or bags 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 judgement: In its milder forms, symptoms of poisoning may take some time (up to 24 hours) to make their appearance, and the

Give complete rest for 1-2 days, during which the patient must be kept quiet and warm.
 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

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

Where pulmonary edema is observed, steroid 'therapy should be considered and close medical supervision is recommended. Blood transfusions may be necessary.
 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 fungs: 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 phosphide 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 carbomedicinalis.

D. Physical and Chemical Hazards

Aluminum phosphide in tablets, pellets and bags 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, pellets, or bags from their fragmentation may cause a temperature increase and confine the release of gas so that ignition could become

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 furnigator's exposure to hydrogen phosphide.

Pure phosphine (hydrogen phosphide) gas is practically insoluble in water, fats and oils, and is stable at normal furnigation temperatures. However, it may react with certain metals and cause corrosion, especially at higher temperatures and relative humidities. Metals such as copper from the 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, ewitching gears, communication devices, computers, calculators and other electrical equipment should be protected or removed before furnigation. 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. FUMIPHOS tablets, pellets and bags are Restricted Use Pesticide due to the acute inhalation of hydrogen phosphide (phosphine PH 3) gas. These products are for retail sale to and use only by certified applicators for uses covered by the applicators certification or person trained in accordance with the Applicators Manual working under the direct supervision and in the physical presence of the applicator. Physical presence means on site or on the premises. Read and follow the label and the FUMIPHOS. Applicators Manual which contains complete instructions for the sale use of this pesticide.

2. FUMIPHOS 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: PHOSFUME CHEMICAL CO. a subsidiary of Midland Fumigant Co., Inc., 1805 S. 2nd St., Leavenworth, KS 66048.

Persons working with FUMIPHOS 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 furnigation of structure if entry into the structure is required for application of the furnigant. Two trained persons must also be present during reentry into furnigated or partially aerated structures. Only one trained person is required to be present when FU-MIPHOS 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 furnigated intransit. However, trucks, vans, trailers and similar transport vehicles cannot be moved over public roads

and highways until they are acrated and the warning placards removed.

5. Do not furnigate commodities with FUMIPHOS when commodity temperature is below 40 degrees F. (5)

degrees C.), 6. The site to be furnigated 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 furnigant to include emergency procedures etc., where required, and to decide how monitoring should be conducted to prevent excessive exposures.

7. Wear dry gloves of cotton or other material while handling FUMIPHOS tablets, pellets, or bags. Wash hands

thoroughly after use.

. Hydrogen priosphide: gas may flash at concentration above its flammable limit. Therefore, always open FUMIPHOS 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 applicators exposure to hydrogen phosphide gas.

9. Piling of tablets, pellets or bags or addition of liquid to FUMIPHOS 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 FUMIPHOS from excessive exposure to atmospheric moisture during application and tightly reseal the aluminum flask prior to returning tablets or pellets to storage. FUMIPHOS bag containers, once opened cannot be resealed for future use.

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 furnigation with FUMIPHOS.

12. Do not allow FUMIPHOS or its residual dust to come in contact with processed foods or commodity

packages intended for retailers except that FUMIPHOS tablets, pellets or bags may be added directly to processed brewers rice, malt and corn grits used in the manufacture of beer.

Respiratory protection approved for the concentration to which the fumigator will be exposed must be available if FUMPHOS is to be applied from within the structure to be furnigated. Respiratory protection need not be available for uses such as outdoor application, addition of tablets or pellists to automatic dispensing devices, etc., if exposures above the TLV's 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 = NKOSH/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 annual basis relevant safety information for use in the event of an emergency.

FUMIPHOS has been found effective against the following insects and their preadult stages - that is eggs, larvae, and puppe:

angoumois grain moth bean weevil bees cereal leaf beetle cigarette beelle confused flour beelle dermestid beedes dried fruit moth European grain moth flat grain beetle fruit flies granary weevil greater wax moth

hairy fungus beetle Hessian fly Indian meal moth khapra beese lesser grain bore maize weevil Mediterranean flour moth pink boliwom raisin moth red flour beede rusty grain weavil saw-soothed grain beetle spider beetles tobacco moth vellow meal worm

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 desages 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:

#### Minimum Exposure Periods for FUMIPHOS

Temperature	Pellets	Tablets	Bags
below 40°F (5°C)	Do not fumigate	Do not fumigate	Do not furnigate
40°-53°F (5-12°C)	8 days (192 hours)	10 days (240 hours)	14 days (336 hours)
54°-59° F (12-15°C)	4 days (96 hours)	5 days (120 hours)	7 days (168 hours)
60°-68° F (16-20°C)	3 days (72 hours)	4 days (96 hours)	4 days (96 hours)
above 68° F (20°C)	2 days (48 hours)	3 days (72 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 FUMIPHOS 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 furnigations. The proper length of the furnigation 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 FUMIPHOS 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 furnigated 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 furnigated. Exposure times must be lengthened to allow for penetration of gas throughout the commodity when furnigant is not uniformly added to the mass, for example, by surface application or shallow probing. This is particularly important in the furnigation 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 peats under all conditions nor will they always provide for total reaction of FUMIPHOS, particularly if temperatures and commodity moisture levels or humidity are low during the fumigation.

D. Commodities Which May be Furnigated with FUMIPHOS

FUMIPHOS may be used for the furnigation 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

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

Raw Agricultural Commodities and Animal Feed and Feed Ingredients Which May be Furnigated with

**Almonds** Animal Feed Barley Brazil Nuts Cashews Cocoa Beens Coffee Beans Com

Pistachio Nuts Рорсот Rice Rye Salfiower Seed

Seed & Pod Vegetables Cottonseed Dates Sesame Seed

**Filberts** Flower Seed **Grass Seed** Legumes Milet

Sorphum Soybeans Sunflower Seeds Triticale Vegetable Seeds Walnuts

The listed processed foods may be furnigated with FUMIPHOS. Under no condition shall any processed food or bagged commodity come in contact with FUMIPHOS tablets, pellets, bags or residual dust except that FUMIPHOS may be added directly to processed brewer's rice, mait and corn grits for use in the manufacturer of beer.

#### Processed Foods Which May be Furnigated with FUMIPHOS

Processed candy and Sugar

Cereal Flours and Bakery Mixes

Cereal Foods (including cookies, crackers, macaroni, noodies, 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

Processed Nuts (almond, apricot kernels, Brazil nuts, cashews, filberts, pcc.nuts, pecans, pistachio nuts, and

Processed outs (including outment)

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 furnigated with FUMIPHOS. Tobacco and certain other of the nonfood commodities should not be contacted by tablets, pellets or residual dust.

#### 4. Nonfood Commodities which may be Furnigated with FUMIPHOS

Processed or Unprocessed Cotton, Wool and other Natural fibers or Cloth, Clothing

Straw and Hay

Feathers

Human Hair, Rubberized Hair, Vulcanized hair Mohair

Leather Products, Animal Hides and Furs

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)

Hydrogen phosphide is a mobile gas 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 FUMIPHOS is required to treat a 30,000 bushel allo 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 furnigations;

#### Dosage Guidelines for Fumigations with FUMPHOS

Product	per 1000 cu, ft.*	per 1000 bu."	
Bags	2 -6	2 - 6	
Pellets	100 - 725	120 - 900	
Tablets	20 - 145	25 - 160	

"Dosage range for dates, nuts & dried fruits is 100-200 pellets, 20-40 tablets, 2-6 bags/1000 cu. ft.; 125-250 pellets, 25-50 tablets, 125-250 pellets, 2-6 bags/1000 bu.

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 mide range of dosages listed above is required to handle the variety of furnigation situations encountered in practice. Some what higher dosages are usually recommended under cooler, drier conditions or where exposure periods are relatively short.

However, the major factor in selection of cosage is the ability of the structure to hold hydrogen phosphide gas during the furnigation. A good illustration of this commission 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 furnigations, proper distribution of lethal concentrations of gas to reach all parts of the structure—becomes a very important factor in cose selection. An example where this may occur is in the treatment of grain stored in tall silos. Poor gas distribution inscently results when the furnigant 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 furnications:

#### Recommended FUMIPHOS Dosages for Various Types of Fumigations

Type of Fumigation 1. Space	Bags	Pellets	Tablets
Mills, Warehouse, etc.	2-6/1000 cu. 5	100-300/1000 cu. ft.	20-60/1000 cu, ft.
Bagged Commodities	2-6/1000 cu. 5	150-300/1000 cu. ft.	30-60/1000 cu, ft.
Processed Fruits & nuts	2-6/1000 cu. 5	100-200/1000 cu. ft.	20-40/1000 cu, ft.
Stored tobacco	2-6/1000 cu. 5	160-200-/1000 cu. ft	20-40/1000 cu, ft.
2. Bulk Stored Commodities	2-6/1000 cu. 5	150-300/1000 cu. ft.	30-70/1000 cu, ft.
Vertical storages	2-6/1000 BU	200-375/1000 BU	40-75/1000 BU
Tanks	2-6/1000 cu. fz	150-350/1000 cu. ft.	30-60-/1000 cu, ft.
	2-6/1000 BU	200-450/1000 BU	40-90/1000 BU
Flat storages	2-6/1000 cu. 5	250-725/1000 cu. ft.	50-145/1000 cu. ft.
	2-6/1000 BU	300-900/1000BU	60-180/1000 BU
Farm Bins	2-6/1000 cu. f:	350-725/1000 cu, ft.	70-145/1000 cu. ft.
	2-6/1000 BU	450-900/1000 BU	90-180/1000 BU
Bunkers & tarped	2-6/1000 cu. t.	150-400/1000 cu, ft.	30-80/1000 cu, ft.
ground storages	2-6/1000 BU	200-500/1000 BU	40-100/1000 BU .
Railcars	2-6/1000 cu. ft.	150-325/1000 cu. ft.	30-65/1000 cu, ft.
	2-6/1000 BU	200-400/1000 BU	40-80/1000 BU
Barges	2-6/1000 cu. ft.	150-400/1000 cu. ft.	30-80/1000 cu. ft.
	2-6/1000 BU	200-500/1000 BU	40-100/1000 BU
Shipholds	2-6/1000 cu. ft.	30-330/1000 cu. ft.	30-66/1000 cu. ft.
	2-6/1000 BU	200-375/1000 BU	40-75/1000 BU

Higher dosages are recommended in structures that are of loose construction and in the furrigation of butk 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 copil cation 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 applicator, seration and disposal of the furnigant so as to keep a minimum any exposures to hydrogen phosphoe. See the requirements for Industrial Hygiene Monitoring under the Applicator and Worker Exposure section of this Applicators. Manual.

8

- FUMIPHOS tablets or pellets or bags, should be applied so as to provide effective gas concentrations throughout the storage. When tablets or pellets or bags are not applied uniformly to a bulk commodity. (surface application in a tall silo or ships 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.

Ideally, exposure periods should be long enough to provide for adequate control of insect pests and also

more or less completely react the furnigant.

e. Piling of large numbers of tablets or pellets, whether applied to a bulk commodity or for space furnigation, 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.

Contact with liquid water should be carefully avoided when applying FUMIPHOS for treatment of bulk

commodities or space.

g. Aluminum phosphide furnigants 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 guidelines for typical furnigations. These instructions are not intended to cover every t; pe of situation nor are they meant to be restrictive. Other procedures may be used if they are sale, 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 furnigated unless they are completely tarped. Do not furnigate storages which will be entered by humans or animals prior to aeration. Do not furnigate 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 FUMIPHOS has been applied. Tarping the grain surface will greatly reduce the leak rate of the gas as well as reduce the amount of FUMIPHOS 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.

FUMIPHOS tablets, pellets, or bags 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 or 60-150 bags. 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 FUMIPHOS. Addition of FUMIPHOS to water in an aeration duct may result in a fire. Seal the aeration fan with 4 mil plastic sheeting.

Post furnigation 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

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 furnigations 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, pellets, or bags by surface application, shallow probing, deep probing or uniform addition as the bin is filled.

Storages requiring more than 24 hours to fill should not be treated by addition of furnigant 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, tablets

or bags 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 furnigant 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 FUMIPHOS 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 furnigation warning placards.

4. Furnigation of vertical Storages (concrete upright bins and other silos in which grain can be rapidly

a. Close all openings and seal all oraliks to make the istructure as airtight as possible. Prior to the furnigation, seal the vents near the bin top which connects to adjacent bins.

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

c. Seal the bin deck openings after the lumigation has been completed.
d. Bins requiring more than 24 hours to fill should not be furnigated by continued addition into the commodity stream. These bins must be furnigated 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 FUMIPHOS has not been applied uniformly throughout the commodity mass.

e. Place warning placards on the discharge gate and on all entrances.

5. Furnigation of Mills, Food Processing Plants and Warehouses
a. Using the label, calculate the length of the furnigation and dosage of tablets, pellets or bags to be applied based upon volume of the building, air and /or commodity temperature and the general sightness of the structure, b. Carefully seal and placard the space to be furnigated.

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 FUMIPHOS pellets or tablets. Bags should be spread evenly on the floor. Use lotal floor space.
d. Spread FUMIPHOS on the sheets at a density no greater than 30 tablets per sq. ft. This corresponds slightly more than one-half flask of tablets of one-half flask of pellets per 3" x 4" sheet. Check to see that

FUMIPHOS has not piled up and that it is spread evenly to minimize contact between the individual pellets, tablets, and bags

 e. Doors leading to the furnigated space should be closed, sealed, locked, and placarded with warning signs.
 f. The furnigation 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 spent bags, and FUMIPHOS dust and dispose of it, with or without further deactivation, following the recommendations given under Disposal Instructions.

h. Remove fumigation warning placards from the laerated structure.

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

Railcars, containers, trucks, vans and other transport vehicles loaded with bulk commodities to which FUMIPHOS tablets, petlets, or bags may be added directly are treated in essentially the same way as any other flat storage facility. FUMIPHOS 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, pellets, or bags may be probed below the surface. Carefully seal any vents, cracks, or other leaks, particularly if the furnigation is to be carried out intransit. Remember, railcars and containers shipped piggyback by rail may be furnigated intransit, 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 FUMIPHOS. 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 will suited for furnigation. 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 furnigation 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 furnigation 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 furnigation. 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 furnigations 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, pellets or bags 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 FUMIPHOS at any one point. The FUMIPHOS 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. FUMIPHOS bags are recommended for the treatment of bagged commodities and processed foods although tablets and pellets on trays or sheets of Kraft paper may be used. Care should be taken to see that the poly is not allowed to cover the FUMIPHOS and prevent contact with moist air or confine the 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 on the enclosure,

- 8. Fumigation of Ships
- a. General Information
- 1. IMPORTANT shipboard, intransit ship or shiphold furnigation is also governed by U.S. Coast Guard Regulation 46 CFR 147A. Refer to this regulation prior to furnigation.
- 2 FUMIPHOS tablets , pellets, and bags are classified by EPA as restricted use pesticides due to the courte 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 applicators certification or persons trained in accordance with the Applicators 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 PHOSFUME

130018

CHEMICAL CO. a subsidiary of Midland Fumidant Co., Inc. Applicators manual which contains complete instructions for the safe use of this pesticide.

b. Pre-Voyage Fumigation Procedures

 Prior to lumigating a vessel for intransk 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 by the ships crew throughout the duration of the furniqueion. If it is determined that the design and configuration of the vessel does not allow sale occupancy by the ships crew throughout the duration of the furnigation, then the vessel will not be furnigated 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 furnigator that the vessel is safe for occupancy,

2. The person responsible for the furnigation must notify the master of the vessel, or his representative, of the requirements relating to personal protection equipment", detection equipment that a person qualified in the use of this equipment must accompany the vessel with cargo under furnigation. Emergency procedures, cargo ventilation, periodic monitoring and inspections, and first aid 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 is approved for use up to 15 ppm, SCUBA or its equivalent must be used above 15 ppm or at unknown concentrations.

- Seal all openings to the cargo hold or tank and lock or otherwise secure all openings, manways, etc., which might be used to the 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 furnigation warning signs.
- 5. If the fumigation is not completed and the vessel agrated 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 furnigation, or until a manned vessel leaves port or the cargo is aerated, the person in charge of the funigation shall ensure that a qualified person using gas or vapor detection equipment tests spaces adjacent to spaces containing furnigated cargo and all regularly occupied spaces for furnigant leakage. If leakage of the furnigant is detected, the person in charge of the furnigation 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, or his representative, the precautions and procedures for during the vuyage.
- application Procedures for Bulk Dry Cargo Vessels and Tankers
   Apply tablets, pellets or bags by scattering uniformly over the commodity surface or they may shallow or deep probed into the commodity mass.
- 2. Immediately after application of the fumigant, close and secure all hatch covers, tank tops, butterworth valves, manways, etc.

d. Intransit Fumigation of Containers Aboard Ships

Intransit furnigations of containers on ships is also governed by U.S. Coast Guard Regulation 46 CFR 147A as moduled by U.S. Coast Guard Special Permit 52-75. This permit which must be obtained prior to the furnigation is available from:

> **U.S. Coast Guard** Hazardous Materials Branch MTH-1 Washington, D.C. 20593-0001

Applicat rocedures for furnigation of raw commodities or processed foods in containers and other transport vehicles are described in section 3a.

e. Presautions and Procedures During Voyage

- 1. Using appropriate gas detection equipment, monitor spaces adjacent to areas containing furnigated cargo and all regular occupied areas for furnigant 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 furnigated areas except under emergency conditions. If necessary to enter a furnigated area, appropriate personal protection equipment must be used. Never enter furnigated, areas alone. At least one other person, wearing personal pictection equipment, should be available to assist in case of an emergency.

f. Precautions and Proplemas During Discharge.

1. If necessary to enter hims of or to be charge, test spaces directly above grain surface for full-liquing. concentration, using appropriments solvection and personal safety equipment. Do not allow entry to furnigant areas

BEST AVAILABLE COPY

without personal safety equipment, unless furnigant concentrations are at safe levels, as indicated by a suitable detector.

9. Fumigation of Barges

Barge furnigations are also regulated by U.S. Coast Guard regulation 46 CFR147A as modified by U.S. Coast Guard Special Permit 2-75. This permit which must be obtained prior to the furnigation is available from:

> **U.S. Coast Guard** Hazardous Materials Branch MTH-1 Washington, D.C. 20593-0001

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

10. Fumigations in Small Seciable Enclosures

Excellent results may be attained in the treatment of small enclosures since it is often possible to control the furnigation and also to make the enclosure virtually gas tight. Take care not to overdose during these furnigations. A single pellet will treat a space of from 1.4 to 10 cubic feet, From 6.9 to 50 cubic feet may be furnigated with a single FUMIPHOS tablet or 1 FUMIPHOS bag.

11. Treatment of Beehives, Supers and other Beekeeping Equipment
FUMPHOS tablets, pellets and bags may 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 petets or 3 bags per 1000 cu. ft.
Furnigations may be performed in chambers at atmospheric pressure, under tarpaulins, etc. by placing bag
and the tablets or petets on trays or in moisture permeable envelopes. Do not add more than 2 tablets or 10 petets to each envelope. Honey from treated hives or supers may only be used for bee food.

12. Burrowing Pest Control

a. List of Burrowing Pests

FUMIPHOS tablets, pellets and bags may be used out of doors only for the control of the following burrowing rodents and moles: Marmot sp. - Woodchucks and yellow-belly Marmots (Rockchucks), Prairie Dogs (except Utah Prairie Dogs), Norway and Roof Rats, Mice, Ground Squirrels, Moles, Voles, Gophers, and Chipmunk.

Add from one 1 to 4 FUMIPHOS tablets, 5 to 20 pellets, or 2 to 6 bags to each burrow opening. Then seal tightly by shoveling soil over the entrance after first packing the opening with crumpled newspaper or something similar so as to prevent soil from covering the FUMIPHOS and slowing its action. Subsurface tunnels or runways should be treated every 5 to 10 feet with a dose of 2 to 4 tablets, 10 to 20 pellets, and 2 to 6 bags. Use lower rates in smaller burrows in tight soils under moist soil conditions and higher rates in larger burrows porous soils when soil moisture is low. Addition of several cups of water to the burrow prior to dosing with FUMIPHOS may improve efficacy in some porous soils. Treat reopened burrows and fresh runways a second time to to 3 days after the initial treatment.

FUMIPHOS may be used out of doors only for control of burrowing pests. Do not use within 15 feet (5 meters) of inhabited structures. Do not apply to burrows which may open under or into occupied buildings. For use on all

agricultural and noncropland areas. c. 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 wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water by cleaning of equipment, or disposal of wastes, d. Endangered Species Restrictions

The use of FUMIPHOS 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 os 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 State of Arizona, Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oldahoma, 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, Montersy, San Benito, San Luis Obispo, Santa Barbara, Tulare and Ventura in the State of California.

e. Special Local Restrictions
1. North Carolina

FUMIPHOS tablets, pellets, and bags may only be used for control of rats and mice in the State of North Carolina. Use against other pests is not permitted.

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.

Use of FUMIPHOS tablets, pellets, or bags for mole control is not legal in the State of Indiana.

A state permit is required for use of pesticide in Missouri to control small mammals, except rate and mice. Please contact the Missouri Department of Conservation office for information.

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.

California
 Use of FUMIPHOS tablets, pellets, and bags 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 FUMIPHOS tablets, pellets or bags 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 tilkely to exceed the TWA of 0.03 ppm during application, or a 0.03ppm ceiling at any time alterwards. For example, respiratory protection is required to be worn upon reentry into a partially serated structure if the hydrogen Phosphide concentration is above .03 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

## PHOSFUME CHÉMICAL CO. a subsidiary of Midland Fumigant Co., Inc. 1805 S. 2nd St., Leavenworth, KS 66048

#### B. Permissible Gas Concentrations Ranges for Respiratory Protection Devices

A NIOSH/MSHA approved, full-faced has mask-hydrogen phosphide canister combination may be used at levels up to 15 ppm or to escape from levels up to 1500 ppm. Above this level or 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/OSHA 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 FUMIPHOS is to be applied from within the structure to be furnigated, an approved full-face mask
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 furnigation site.

Respiratory protection need not be available for applications from outside the area to be furnigated 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 furnigant cannot be made from outside the structure, an approved canister respirator must be worn during application from within the structure being

#### SECTION 6 **PLACARDING OF FUMIGATED AREAS**

The applicator must placard or post all entrances to the structure under furnigation, with signs bearing, in

English and Spanish:

1. The signal word DANGER/PELIGRO and the SKULL AND CROSSBONES symbol in red.

2. The statement "Area and/or commodity under furnigation, DO NOT ENTER/NO ENTRE".

3. The statement, This placard may only be removed after the furnigated area is aerated down to 0.3 ppm. hydrogen Phosphide or below. Transfer of incompletely aerated commodity to a new site is permissible provide 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 fumigation, begins and is completed.

5. Name of furnigant used.

Name, address and telephone number of the applicator.

All entrances to a furnigated area, must be placarded. Where possible, placards should be placablin, a J. ance of the furnigation to keep unauthorized persons away. For railroad hopper cars, placards must be placed on both

1 311

sides of the car near the ladders and next to the top hatches into which the furnigant 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 furnigated 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 of 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 texicological 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 AERATION OF FUMIGATED COMMODITIES**

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 acrate 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 furnigated in hogshead and, for at least two days (48 hours) when furnigated in other containers. Tobacco furnigated in containers with plastic liners will probably require longer aeration periods to reach 0.3 ppm

# SECTION 8 EXPOSURE

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 furnigant and closing up the site to be furnigated. 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, FUMIPHOS tablets, pellets and bags 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 furnigant in the desired areas and then vacate the premises without significant exposure to the gas. If the furnigators is likely to exceed the eight hour TWA of 0.3 ppm, approve respiratory protection must be worn. 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, PH 3) detector tubes may be obtained from PHOSFUME CHEMICAL CO. a subsidiary of

## 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 furnigated 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 furnigation, 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 Unserated 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 Hyglene 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. This mandatory although, once exposure 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. Cas measurements should be made in the workers breathing zone. Monitoring is not required for outdoor uperations. 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 are relatively rapidly, inexpensive and accurate. Low level industrial hygiene

#### SECTION 9 STORAGE INSTRUCTIONS

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

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

FUMIPHOS tablets, pellets and bags are supplied in gas tight, rescalable aluminum flasks. Do not expose the product to atmospheric moisture any longer than is necessary and seel tightly before returning opened flasks to

The shelf life of FUNIPHOS is virtually unlimited as long as the containers are tightly sealed.

## **DISPOSAL INSTRUCTIONS**

A. General

 Do not contaminate water, food or feed by storage or disposal.
 Unreacted or partially reacted FUMIPHOS 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 in a sanitary landfill or other approved site, or by other procedures by state and local

If properly exposed, the residual dust remains after a furnigation with FUMIPHOS will be a grayish-white powder. This will be a non-hazardous waste and contain only a small amount of unreacted aluminum phosphide. However, residual dust from incompletely exposed FUMIPHOS, so called "green dust" will require special care.

#### B. Directions for Disposal of Residual Dust from FUMIPHOS

 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 FUMIPHOS 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 FUMIPHOS 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 to collect dust from more than 7 flasks of tablets or 10 flasks of pellets (about 11 kg, or 25 kbs) 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 Partialty Spent Residual Duet from FUMIPHOS

1. Partialty spent dust must 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 furnigation which has produced large quantities of partialty spent material. "Green dust" must be further deactivated prior to disposal in landfills.

2. Residual dust from FUMIPHOS 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 a 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 furnigated structure, Dust from FUMIPHOS tablets, pellets, or bags 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 our noto the

landfill or other suitable site approved by local authorities. Where permissible, the sturry may be poured not onto the ground. If the sturry has been held for 36 hours or more, it may be poured into a storm sewer.

d. Causion: Respiratory protection is required during wet deactivation of partially spent material. Do not dispose of dust in a toilet. Do not allow quantities of dry residual dust from FUMIPHOS to be collected or stored without deactivation.

Residual dust from FUMIPHOS 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 "oreen 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 NIOSHMSHA approved respiratory protection may be worn if the concentration is known. Do not use water at any time to clean up a spill of FUMIPHOS. Water in contact with unreacted tablets, pellets or bags 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 FUMIPHOS 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

PHOSFUME CHEMICAL CO. a subsidiary of Midland Fumigant Co., Inc.

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

If the age of the spill is unknown or if the tablets, pellets, and bags 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 spiked material, 1 to 1.5 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 11g. 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 from inhabited buildings 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:

 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 or 4 cups in 30 gallon is suggested. The container should be filled with deactivation solution to within a few inches of the top.

2. The tablets, pellets, or bags are poured slowly into the deactivating solution and stirred so as to thoroughly wet all of the FUMIPHOS. This should be done in the open air. FUMIPHOS tablets, pellets, and bags should be mixed into no less, than about 15 gallons of water-detergent solution for each, case of spent material. Wear appropriate respiratory 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 sturry 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 FUMIPHOS. Never place pellets, tablets, or bags in a closed container such as a dumpster, sealed drum, plastic bag, etc. as flammable concentrations and a flash of hydrogen phosphide gas likely to develop.

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

FOR ASSISTANCE, CONTACT:

## PHOSFUME CHEMICAL CO., a subsidiary of Midland Fumigant Co., Inc.

1805 S. 2nd St. Leavenworth, KS 66048

FUMIPHOS Pellets EPA Reg. No. 43568-1 FUMIPHOS Bags EPA Reg. No. 43568-2 FUMIPHOS Tablets EPA Reg. No. 43568-3