

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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43568-2
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MAR 20 1990

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

Subject: Product Name: Quick Phos Aluminum Phosphide Bags
EPA Registration No.: 43568-2
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

SYMBOL							
SURNAME							
DATE							

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

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
This fungicide is a highly hazardous material and may only be used by individuals trained in its proper use. Before using, read and follow all precautions and directions on the label and in the product manual. See Product Manual for Quick-Phos. Applicator's Manual for complete use directions is available from Midland Fungants Inc., 1805 South 2nd, Leavenworth, KS 66048, (913) 651 3980.

SPILL AND LEAK PROCEDURES

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 phosphine gas is unknown. Other NIOSH/MSHA approved respiratory protection may be worn if the concentration is known. Do not use water at any time to clean up a spill of aluminum phosphide. Water in contact with unreacted tablets, pellets, or bags will greatly accelerate the product of phosphine gas which could result in a toxic and/or fire hazard. Wear cotton gloves when handling pesticides. Return all intact cans to cardboard cases or other suitable packaging which has been properly marked according to DOT regulations. Notify consignee and shipper of damaged cases. If cans have been punctured or damaged so as to leak, the container may be temporarily secured with aluminum tape or the aluminum phosphide may be transferred from the damaged cans to a sound metal container which should be sealed and properly labeled as aluminum phosphide. Transport the damaged container to an area suitable for pesticide storage for inspection. Further instructions and recommendations may be obtained, as required from M.F.I. FUNGANTS INC.

STORAGE AND DISPOSAL

STORAGE: STORE IN A DRY, WELL VENTILATED AREA AWAY FROM HEAT, UNDER LOCK AND KEY. POST AS A PESTICIDE STORAGE AREA. DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORING PESTICIDES IN THE SAME AREAS IN THE SAME AREAS USED TO STORE THESE COMMODITIES. DO NOT STORE IN BUILDINGS INHABITED BY HUMANS OR DOMESTIC ANIMALS. ALUMINUM PHOSPHIDE PRODUCTS SHALL NOT BE PLACED IN, OR ATTACHED TO PACKAGES INTENDED FOR RETAILERS.

DISPOSAL OF UNREACTED OR PARTIALLY REACTED QUICK-PHOS TABLETS, PELLETS, OR BAGS: (FROM SPILLS, LEAKING CONTAINERS OR OTHER SOURCES) UNREACTED OR PARTIALLY REACTED ALUMINUM PHOSPHIDE IS ACUTELY HAZARDOUS. IMPROPER DISPOSAL OF EXCESS PESTICIDE, SPRAY MIXTURE OR RINSATE IS A VIOLATION OF FEDERAL LAW. IF THIS PRODUCT CANNOT BE DISPOSED OF BY ORDINARY USE OR ACCORDING TO LABELING INSTRUCTIONS, CONTACT YOUR STATE PESTICIDE OR ENVIRONMENTAL CONTROL AGENCY, OR THE HAZARDOUS WASTE REPRESENTATIVE AT THE NEAREST E.P.A. OFFICE FOR GUIDANCE. DO NOT CONTAMINATE WATER BY DISPOSAL. REACTED QUICK PHOS TABLETS, PELLETS, OR BAGS ARE NOT HAZARDOUS. FOR COMPLETE DISPOSAL, SPILL AND LEAK PROCEDURES, REFER TO THE BOOKLET "QUICK PHOS APPLICATION PROCEDURES".

DISPOSAL OF TABLETS, PELLETS OR BAGS: REFER TO THE BOOKLET ENTITLED "QUICK PHOS APPLICATION PROCEDURES".

DISPOSAL OF EMPTY CANS: DISPOSE OF EMPTY CANS IN A SANITARY LANDFILL OR BY OTHER APPROVED STATE OR LOCAL PROCEDURES.

GENERAL: CONTACT FEDERAL, STATE, AND LOCAL WASTE DISPOSAL AUTHORITIES FOR APPROVAL OF PROCEDURES OTHER THAN THOSE LISTED ABOVE. APPROVED PROCEDURES MAY VARY AS TO LOCATION. IF DOUBT EXISTS AS TO WHETHER THE DUST IS REACTED OR CONCERNING PROPER DISPOSAL TECHNIQUES, CONTACT MIDLAND FUNGANTS INC.

SEE PRODUCT MANUAL FOR ADDITIONAL INFORMATION.

WARRANTY

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

BEST AVAILABLE COPY

PS 4/8/84