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OCT 15 1997

Mr. James R. Melton
Chem-Tech., Ltd.
4515 Fleur Drive, #303
Des Moines, IA 50321

Dear Mr. Melton:

Subject: Label Amendment in Response to Basic Supplier's Deletion of Certain DDVP Uses;
Alternate Confidential Statement of Formula
VAP-2
EPA Registration No. 47000-71
Your Applications Dated August 23, 1995 and December 30, 1993

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:

1. On the front panel revise the statement to read: "FOR SALE TO, USE AND STORAGE BY PEST CONTROL OPERATORS ONLY OR FOR SALE TO, USE AND STORAGE BY COMMERCIAL, INDUSTRIAL APPLICATORS ONLY."
2. Under Fogging add: "Keep a minimum of 7 day interval between applications except on cocoa bean and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams a.i. per 1000 cubic feet of head space. Do not make applications when temperatures are below 60° F."
3. Revise the statement beginning with VAP-20 treatments must be made during hours.....to read as follows:

All treatments should be made during the hours when buildings are unoccupied. Buildings treated should be closed and ventilation kept at a minimum during application. Lock all entrances and do not allow unprotected workers to enter building during treatment. Place WARNING signs at all entrances stating: "THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO REENTRY OF UNPROTECTED WORKER."

THIS BUILDING MUST NOT BE ENTERED WITHOUT PERSONAL PROTECTION EQUIPMENT FOR 24 HOURS; OR, UNTIL A DIRECT INDICATING SHORT TERM CONCENTRATION MONITORING DEVICE (e.g. a Dräger Tube) INDICATES THAT THE DDVP AIR CONCENTRATION

IS EQUAL TO, OR LESS THAN, 50% OF THE PEL (0.1 PPM) AN AIR CONCENTRATION OF 0.05 PPM OR LESS IS REQUIRED FOR ENTRY WITHOUT PERSONAL PROTECTION EQUIPMENT.

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

- 4. Following the paragraph on Fogging add: "Note: Use is prohibited in: Food/feed manufacturing establishments: bottling plants (including wineries, breweries, soft drinks), frozen food/feed (including pizza plants and ice cream plants) excluding non-food/feed manufacturing areas; Food/feed processing establishments: meat, poultry and seafood slaughtering and/or packing plants (including edible fats and oils), frozen food/feed plants (including fruit and vegetables), dairy product plants (including milk processing plants) excluding non-food/ feed processing areas."
- 5. Under Environmental Hazards revise the second sentence to read "Do not apply directly to water." Delete the third sentence and revise the fourth sentence to read "Do not contaminate water by disposing of equipment washwaters."
- 6. Under Precautionary Statements replace the protective clothing statement and respirator statement with the following:

Personal Protective Equipment (PPE)

Some materials that are chemical resistant to this product are listed below. If you want more options follow the instructions of category "C" on an EPA chemical resistance category selection chart in the Worker Protection Standard.

Applicators and other Handlers Must Wear:

- Coveralls over long-sleeved shirt and long pants.
 - Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride or Viton
 - Chemical-resistant footwear plus socks
 - Protective eyewear
 - Chemical resistant headgear for overhead exposure
 - Chemical resistant apron required for mixing/loading and cleaning equipment
 - Respirator with either an organic vapor removing ON cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TX-23C) or a canister approved for pesticides (MSHA/NIOSH approval number TC-14G)
- Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this products concentrate. Do not reuse them. Follow manufacture's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

7. Following Fogging directions add "Drum Handling: Handle carefully to prevent damage and leakage. Opened drums only when set on end and under a ventilated hood or when wearing a n approved respirator and appropriate protective clothing. Open bungs slowly to release pressure."
8. Delete the pest "tobacco moth."
9. Add the statement: "For use in warehouses, silos, bulk bins containing non-perishable, packaged or bagged raw processed food/feed commodities or bulk raw or processed food/feed commodities, flour and grain mills and bakeries."

Your Confidential Statement of Formula dated December 30, 1993 for the basic formulation has been reviewed and is acceptable with the following comment: separate certified limits are required for dichlorvos and the related compounds which are based on the nominal concentration of 18.6% and 1.4%, respectively. The certified limits should be calculated in accordance with 40 CFR 158.175 (b)(2).

Submit two copies of each final printed labeling before you release the products for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,

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

**PRECAUTIONARY
STATEMENTS
HAZARDS TO HUMANS &
DOMESTIC ANIMALS
DANGER**

Fatal if swallowed, inhaled or absorbed through the skin or eyes. Do not get in eyes, on skin, or clothing. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse. Do not breathe vapor or spray mist. Rapidly absorbed through skin. Wear natural rubber gloves, waterproof protective clothing and goggles when handling. Wear a pesticide respiratory jointly approved by the Mine Safety and Health Administration and by the National Institute for Occupational Safety and Health under the provision of 30 CFR, Part II.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not puncture. Do not use or store near heat or open flame. Exposure to temperatures above 130°F may cause bursting. Never throw container into fire or incinerator.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.
Container Disposal: Return empty cylinder for reuse.

WARNING: Contains methyl chloroform a substance which harms public health and environment by destroying ozone in the upper atmosphere.



**FOR USE BY PEST CONTROL OPERATORS
OR TRAINED PERSONNEL ONLY**

ACTIVE INGREDIENTS:	
Dichlorvos (2,2-Dichlorovinyl dimethyl phosphate)	18.6%
Related Compounds	1.4%
INERT INGREDIENTS:	
	80.0%
Total	100.0%



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

See side and back panels for additional precautionary statements



STATEMENT OF PRACTICAL TREATMENT

If swallowed: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. If possible, vomiting should be induced under medical supervision. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If inhaled: Remove victim to fresh air. Apply respiration if indicated.

If on skin: Remove contaminated clothing and wash affected areas with soap and water.

If in eyes: Flush eyes with plenty of water. Call physician immediately.

NOTE TO PHYSICIAN AND ANTIDOTE STATEMENTS

Solvent presents aspiration hazard. Gastric lavage is indicated if material was taken internally.

POISONING SYMPTOMS: Symptoms include weakness, headaches, tightness in chest, blurred vision, non-reactive pinpoint pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps.

TREATMENT: Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, Atropine sulfate should be injected at 10 minute intervals, in doses of 1 to 2 mgs. until complete Atropinization has occurred. 1-PAM is also antidotal and may be administered with Atropine. Morphine is contra-indicated. Clear chest by postural drainage.

Repeated exposure to cholinesterase inhibitors may without warning, cause prolonged susceptibility to very small doses of any cholinesterase inhibitor.

Allow no further exposure until cholinesterase regeneration has been allowed, as determined by blood test.

**NET CONTENTS: 11 LBS. (4994 GRAMS)
EPA REG. NO. 47000-71 EPA EST. NO. 47000-IA-1**

MANUFACTURED BY:
CHEM-TECH, LTD.
4515 FLEUR DR.
DES MOINES, IA 50321



VAP-20 is for use by pest control operators or trained personnel only. VAP-20 is a specially formulated insecticide designed for use in the control of exposed stages of stored products insects infesting warehouses containing non-perishable, packaged or bagged raw or processed food commodities, as well as bulk grains, and animal feeds.

The term "non-perishable" means any raw or processed food not subject to rapid decay or deterioration that would render it unfit for consumption. Raw commodities would include: cocoa beans, field-dried beans, field-dried peas, grains either bagged or bulk, nuts (ground or tree) and farmer stock peanuts. Processed foods would include: flour, sugar, cereals, packaged goods and crackers. VAP-20 can be used for control and prevention of migration of exposed stages of stored product insects, granary weevils, rice weevils, yellow meal worm, mediterranean flour moth, angoumois grain moth, almond moth, lesser grain borer, tobacco moth, cockroaches, cadelle, ants, spiders, silverfish, fleas, earwigs, waterbugs, confused flour beetles, saw-toothed grain-beetles, cigarette beetles, Indian-mealmoths, and cocoa bean moths in warehouse storage areas, flour and grain mills, and bakeries during time when the

plant is not in operation and no food products are exposed. If bulk, unpackaged foods are exposed, remove or cover before treatment begins. All food processing surfaces must be thoroughly cleaned with a USDA approved cleaner and rinsed with potable water before processing is resumed. VAP-20 cannot be used where hermetically sealed foods or manufactured dairy products or other processed foods requiring refrigeration are stored. It cannot be used where raw commodities such as eggs, milk, poultry, or fresh fruits and vegetables are stored. VAP-20 treatments must be made during hours when buildings are unoccupied. All entrances should be locked and caution signs must be placed at all entrances showing safe re-entry time. During treatment, all entrances and exits should be locked and posted with DANGER signs stating "Insecticide treatment in progress. This building should be opened and aired prior to re-entry to unprotected workers or remain unoccupied by unprotected workers for at least 6 hours after treatment. Do not enter prior to _____ o'clock _____ (date) without protection." Treated areas should not be entered for a period of 6 hours after application and then only after area has been cleared and tested for safe entry.

Fogging: VAP-20 should be applied with a timer or device at the rate of 2.5 to 10 grams per 1000 cubic feet (This gives 0.5 to 2 grams of actual DDVP per 1000 cubic ft) THIS CYLINDER CONTAINS 4994 gms of 20% DDVP. This will yield 39 treatments of 50,000 cubic feet at 2.5 gms per 1000 cu. ft. VAP-20 continues to kill insects from 2 to 4 hours after application. VAP-20 does not penetrate containers and infested products should be treated by other methods approved for this purpose. It is recommended that VAP-20 be used at 70° F. or above. Warm can to room temperature before use.

WARRANTY

NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty nor any other WARRANTY of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE, express or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller and buyer assumes the risk of any such use.

ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 15 1997

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg.

47000-71

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