47000-71

8-15-2000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

August 15, 2000

Chem-Tech Ltd. c/o Ms. Verona M. Sawyer F.P.I. 1902 Tomahawk Ridge New Lenox, IL 60451-2860

Subject:

Submission of Alternate CSF and Label Changes
 Vap-20 Aerosol Insecticide
 EPA Reg. No. 47000-71
 Your submission dated April 28, 2000

Dear Ms. Sawyer:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- Please clarify if the CSF you submitted will be your new basic CSF. Your present CSF dated 12/30/93 contains methyl chloroform which is an Ozone depleting substance. Methyl chloroform is scheduled to be completely phased out by 2002.
- 2) The skull and crossbones must appear in immediate proximity to DANGER/POISON/PELIGRO on the front panel of the label.
- 3) "POISON" must appear in red on a background of a distinctly contrasting color.
- 4) Please rewrite the first paragraph of your "Hazards to Humans and Domestic Animals" to read as follows:

DANGER

Fatal if swallowed, inhaled or absorbed through the skin. Corrosive. Causes irreversible eye damage. May be fatal if swallowed or absorbed through the skin. Harmful if inhaled. Avoid breathing vapor. Do not get in eyes or on skin or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.

5) Please rewrite your "First Aid" statement in accordance with PR Notice 2000-3:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Please add the following information to your "Note to Physician": "Probable mucosal damage may contraindicate the use of gastric lavage." Thank you.

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely. Macenty in Verguin

George L/LaRocca
 Product Manager (13)
 Insecticide Branch
 Registration Division (7505C)

CHEM-TECH VAP-20 with CO2 AEROSOL INSECTICIDE

FOR SALE TO, USE AND STORAGE BY PEST CONTROL OPERATORS ONLY OR FOR SALE TO, USE AND STORAGE BY COMMERCIAL, INDUSTRIAL APPLICATORS ONLY

ACTIVE INGREDIENTS:

÷ 1

2

 ACCEPTED with COMMENTS in EPA Letter Dated

AUG 1 5 2000

KEEP OUT OF REACH OF CHILDREN DANGER POISON

Under the Federal Insecticide. Fungiside, and Rodonticide Act as amended, for the pedicide registered under EPA Rog. No. 47000 - 71

FIRST AID

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. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If Inhaled: Remove victim to fresh air and apply respiration if indicated. Get medical attention. If on skin: Remove all contaminated clothing and wash with soap and water. If signs of cholinesterase inhibition appear, or if irritation persists, get medical attention. If in eyes: Flush with plenty of water. Get medical attention.

NOTE TO PHYSICIAN

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 stimulations. If there are signs of parasympathetic stimulation, atropine should be injected at 10 minute intervals, in doses of 1 to 2 milligrams until complete atropinization has occurred. Morphine is contraindicated. Clear chest by postural drainage. Oxygen administration may be necessary. 2-PAM is also antidotal and may be administered in conjunction with atropine. Observe patient continuously for 48 hours. 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 attained as determined by blood test.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS DANGER

Fatal if swallowed, inhaled or absorbed through the skin. Do not get liquid in eyes. Avoid contact with skin, eyes or clothing. Do not contaminate food products by direct contact with liquid.

Personal Protective Equipment (PPE)		
Some materials that are chemical resistant to this product are listed below. If you want the instructions of category "C" on an EPA chemical resistance category selection catego		
Protection Standard.		• • • •
	C / C C 1	•
Applicators and other Handlers Must Wear:	· · · ·	1 I
 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 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), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P, or HE prefilter. 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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by disposing of equipment washwaters. 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.

VAP-20 is a specially formulated insecticide designed for use in the control of exposed stages of stored products insects infesting warehouses, silos, bulk bins and food/feed processing, food/feed manufacturing, handling and storage plants containing non-perishable, packaged or bagged raw or processed food/feed commodities or bulk raw or processed food/feed commodities and non-food/feed areas of processing and manufacturing plants.

Non-food/feed processing and manufacturing plant use areas include garbage rooms, lavatories, floor drains (to sewer entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

The term "non-perishable" means any raw or processed food/feed not subject to rapid decay or deterioration that would render it unfit for consumption.

Raw commodities would include: animal feed, cocoa beans, dried beans, grain crops, peanuts, soybeans and nut crops. Raw commodities do not include: eggs, milk, meat, poultry, fish, fresh fruits and vegetables.

Processed food/feed would include: flour, sugar, cereals, packaged goods and crackers. Processed food/feed do not include: hermetically sealed food/feed or manufactured dairy products and other processed food/feed requiring freezing or refrigeration.

When using in food/feed processing, food/feed manufacturing, handling and storage areas: Apply only during times when plant is not in operation and no food/feed products are exposed. If bulk, unpackaged food/feed are exposed, remove or cover before treatment beings. All food/feed processing surfaces should be covered during treatment or thoroughly cleaned before using.

NOTE: USE IS PROHIBITED IN:

Food/feed manufacturing establishments: bottling plants (including wineries, breweries, soft drinks), frozen food/feed (including pizza 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.

USE AND APPLICATION DIRECTIONS:

For the control of exposed stages and the prevention of migration of most species of stored product insects; ; ; granary weevils, rice weevils, confused flour beetles, saw-toothed grain beetles, cigarette beetles, Indianmealmoths, and cocoa bean moths.

. . . .

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 _____ gms of 20% DDVP. This will yield _____ 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.

(

Treatment should be made during hours when buildings are unoccupied. Buildings should be closed and ventilation kept at a minimum during application of the insecticide. Lock all entrances and do not allow unprotected workers to enter building when being treated.

Place WARNING signs at all entrances stating:

"THIS BUILDING SHOULD BE OPENED AND AIRED PRIOR TO RE-ENTRY TO UNPROTECTED WORKERS. 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 DRAGER 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:______O'CLOCK______(DATE) WITHOUT PERSONAL PROTECTION REQUIPMENT UNLESS AIR CONCENTRATIONS OF DDVP ARE 50% OF THE PEL OR LESS."

Keep a minimum 7 day interval between applications except on cocoa beans and raw (unshelled) peanuts where daily applications do not exceed 0.5 grams a.i. per 1,000 cubic feet of head space.

Do not make applications when temperatures are below 60 F.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Store containers upright in a secure area under lock and key. Storage area should be equipped to handle an accidental spill.

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

Container Disposal: This cylinder must not be disposed of in any manner. Cylinders must be returned to point of purchase for credit.

WARRANTY

NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purpose 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 reasonable foreseeable to seller and buyers assumes the risk of any such use.

NET CONTENTS.

CDARC

....

	NET CONTENTS: LBS. (GRAM	3)	
EPA REG. NO. 47000-71		EPA EST. NO. 47	′000-IA-1
	MANUFACTURED BY:		
	CHEM-TECH, LTD.		
	4515 FLEUR DR,		
	DES MOINES, IA 50321	• •	
* Editor's Note: Above aste	erisked quantities to be determined based on proc	luct net contents	
			(, , , , , , , , , , , , , , , , , , ,
•		•	,