PM 03 47000-74 10/15/97

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OCT | 5 | 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

VAP-5

EPA Registration No. 47000-74

Your Applications Dated August 23, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, an Rodenticide Act, as amended, is acceptable subject to the comments listed below:

1. On the labeling front panel revise your statement as follows:

FOR SALE TO, USE AND STORAGE BY COMMERCIAL AND INDUSTRIAL APPLICATORS ONLY

2. Revise the front panel statement to read:

For use in Warehouses, Railroad Cars, Stationary Trucks, Flour Mills, Grain Mills Rice Mills containing non-perishable, packaged or bagged raw processed food/feed commodities or bulk raw or processed food/feed commodities. For use in Non-food/Feed Areas of Food/Feed Handling Establishments, Restaurants and other areas where food is commercially prepared or processed.

3. 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.
- 4. Revise the "Treatment should be made ...and posting statements" 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.

- 5. Under Environmental Hazards add the following statement as the first sentence in this paragraph: "This product is toxic to fish, birds and other wildlife." Revise the second statement to read, "Do not contaminate water by disposal of equipment washwaters."
- 6. Under Fogging add: "Keep a minimum of 7 day interval between applications except on cocoa bean and raw (unshelled) peanuts where daily application s 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."

- Qualify the directions for space spray and contact spray and for use as contact spray with non-food/feed processing areas only, i.e., "Space Spray and Contact Spray (Non-Food/Feed Processing Areas Only)." Following this statement indicate the types of Non Food/Feed sites as follows "Non Food/Feed Areas of Food/Feed Handling Establishments are areas such as garbage rooms, lavatories, floor drains, (to sewers entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning and bottling).
- 8. 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."
- 9. Delete tobacco under directions for use.

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 DANGER

Fatal if swallowed, inhaled or absorbed through skin. Wear rubber gloves while filling, running or emptying machine. Do not get liquid in eyes. Avoid contact with skin, eyes or clothing. Wear protective clothing. Wash hands, arms and face with soap and water after handling and before eating or smoking. Do not contaminate food products by direct contact with liquid. Persons exposed to ULV VAP-5 vapors during treatment should wear a protective respiratory device of a type approved by the Mining Enforcement and Safety Administration and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR, Part II, for protection against dichloryos insecticide.

ENVIRONMENTAL HAZARDS

Keep out of any body of water. 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

Not for use or storage in or around the home.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage or disposal. Store containers 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

DIRECTIONS FOR USE

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

VAP-5 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; copoa beans, field-dried beans, field-dried peas, grains, either bagged or bulk Tobacco, nuts and farmer stock peanuts.

Processed foods would include: flour, sugar, cereals, packaged goods and crackers.

USE AND APPLICATION DIRECTIONS:

For the control of the exposed stages and the prevention of migration of most species of stored products insects, granary weevils, rice weevils, confused flour beetles, saw-toothed grain-beetles, cigarette beetles, Indian-meal moths and cocoa bean moths in warohouse 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 spraying begins.

FOGGING — VAP-5 may be used in most types of logging devices with the exception of Thermal logger. The rate of application should be between 1-2 grams actual dichlorvos per 1000 cu. ft. or 1/2 to 1 ounce of liquid per 1000 cu. ft.





5% VAPONA® INSECTICIDE

FOR USE IN WAREHOUSES, RAILROAD CARS AND STATIONARY TRUCKS, FLOUR MILLS, GRAIN MILLS. RICE MILLS

ACTIVE INGREDIENTS % by weight
DICHLORVOS [2,2-Dichlorovinyl
dimethyl phosphate] 4.65**
Related Compounds 0.35
INERT INGREDIENTS* 95.00

*Inert ingredients contains petroleum distillate and 1,1,1-Trichloroethane.

** Equivalent to 5% Vapona Insecticide

KEEP OUT OF REACH OF CHILDREN

DANGER & POISON

See Side Panels for Additional Precautionary Statements.

STATEMENT OF PRACTICAL TREATMENT

It swallowed — Call a physician or poison control center immediately. Drink one or two glasses of water and induce vomiting by touching back of throat with linger. Repeat until vomit is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. If Inhaled —Remove victim to fresh air and apply artificial respiration if indicated. 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. If irritation persists, get medical attention.

NOTE TO PHYSICIAN: Symptoms: Symptoms include weakness, headache, lightness in chest, blurred vision, nonreactive pinpoint pupils, salivation, sweating, nausea, vomiting, diarrhea, or 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 determined by blood test.

NET CONTENTS:

MFG. BY. Chem-Tech, Ltd. 4515 Fleur Dr., Des Moines, IA 50321



ACCEPTED
with COMMENTS
in EPA Lotter Dated

CCT 1 5 1997

Under the Federal Insecticide, Fangiside, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

47000-74

Check amount of liquid in insecticide tank or auxiliary tank before and after treatment to assure proper dosage has been applied. Return unused insecticide to original container and clean machine outdoors using an approved solvent before returning to truck or storage area. This will help preserve equipment and prevent cross-contamination.

Treatment should be made during the 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 buildings when being treated.

Place danger signs at all entrances stating:

Repeat treatment at weekly intervals during season of peak insect activity for optimum results,

Exposed food should be removed or covered before treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before processing is resumed. When using the product in these areas, apply only when the facility is not in operation.

SPACE SPRAY AND CONTACT SPRAY — Dilute to 1-3% with an approved solvent and apply at the rate of 1 gallon of spray per 64,000 cu. ft. to kill roaches, silverfish, fleas, waterbugs, earwigs, ants, spiders, in sheltered situation. Adjust a ULV spraying device to a course spray for control of the above listed crawling insects. Contact as many of the insects with the spray as possible. Thoroughly spray all parts of the room suspected of harboring these insects. Special attention should be paid to cracks, hidden surfaces under equipment, and food storage areas. Then adjust the ULV device to deliver a fine spray for use as a space spray. Sweep up and destroy dead insects. Repeat treatment as necessary.

FOR USE AS A CONTACT SPRAY — Dilute to 1% and spray 1 pint per 10,000 cubic feet or 1,000 square feet of floor space.

Do not use in the edible product areas of food processing plants, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

GENERAL OPERATING INSTRUCTIONS

(For specific operating instructions, refer to Manufacturer's Instruction Booklet furnished with machine)

- Having calculated amount of time required for treatment and flow rate required, place machine at farthest point from intended exit.
- 2. Direct nozzle(s) upward and pointed down aisle, not directly toward any nearby object.
- Start machine and adjust flow to desired rate. Calibrate if necessary. Refer to operating manual.
- Operate for calculated time period. Begin by backing along precalculated path at predetermined speed.
- When treatment time has been completed, stop insecticide flow by closing valve. Wait until spray stops, stop machine and remove from area.
- Wait at least 6 hours after completition of treatment before ventilating, 12 or 16 hours exposure may be used, if convenient or preferred, in which case ventilation is not necessary.

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 arw such use.



ORGANOPHOSPHORUS PESTICIDES, LIQUID, TOXIC, N.O.S., (DICHLORVOS), 6.1, UN3018, PG III, CHECK BOX IF RQ □.

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

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