

DEC 12 1995

Trinity Manufacturing, Inc.
11 E. V. Hogan Drive
Hamlet, NC 28345

Attn: Edward W. Lyle,
Authorized Agent for Trinity Manufacturing, Inc.

Subject: Technical Chloropicrin
EPA Registration No. 62341-15
Your Resubmission of November 30, 1993

Your amendment request to modify the subject product labeling by deleting or eliminating, as stated in your application, "... certain uses which will not be defended by the Chloropicrin Manufacturers Task Force ('CMTF')" has been reviewed. The following comments are a result of our review of your amendment request.

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.

1. Add the following sentence to the "Directions For Use" section: "Reformulators and repackagers of this product must obtain their own registration from the Environmental Protection Agency."

2. Revise the Environmental Hazards statement to read: "This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA."

- One copy of the finished labeling which incorporates the preceding comments must be submitted before releasing the product for shipment.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE	DEC 12						

If you should have any questions concerning this letter, you may call Robert Travaglini on (703) 305-6909.

Sincerely,



Ruth G. Douglas
Product Manager (32)
Antimicrobial Program Branch
Registration Division (7505C)

cc: Sara Beth Watson, Steptoe & Johnson, LLP

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS
AND DOMESTIC ANIMALS:
DANGER**

Toxic, corrosive liquid and vapor. Contact with liquid may produce burns. Do not breathe vapor. Do not get in eyes, on skin, or clothing. Wash all contaminated clothing with soap and water before re-use. Do not re-use contaminated clothing or shoes until free of chemical odor.

THIS FUMIGANT IS A HIGHLY HAZARDOUS MATERIAL AND MUST BE HANDLED WITH CARE ONLY BY THOSE INDIVIDUALS EXPERIENCED WITH ITS PROPER USE. CONSULT YOUR DEALER REPRESENTATIVE OR TRICAL INCORPORATED FOR CORRECT PROCEDURE BEFORE USING. READ AND FOLLOW ALL LABEL DIRECTIONS AND PRODUCT LITERATURE SPECIFIC TO YOUR PARTICULAR REQUIREMENTS.

This fumigant has the capacity to cause marked irritation to the upper respiratory tract and a strong tachymotor effect producing eye irritation. Low concentrations may, if these necessary, cause serious systemic intoxication. It is capable of causing severely painful eye irritation. Relief will not be voluntarily afforded because the effect may be so powerful that a person may become temporarily blinded and panic-stricken and that a fire may lead to accidents.

RESPIRATORY EXPOSURE

RESPIRATORY PROTECTION: Do not breathe fumes. Because of the irritatory action of this fumigant it will serve as its own identifying agent. Help prevent over exposure. However, if over exposure may occur in a confined space, a full face gas mask with an air supply tank or a self-contained respirator is recommended. Read and follow the gas mask manufacturer's recommendations. A full face gas mask with a fresh black canister meeting NIOSH specifications for organic vapors can also be used under certain circumstances here the vapor concentration is known to be under 2% by volume at 100 ppm. Containers should be used for no more than that period recommended by the manufacturer. Devices used containers by crushing chloropicrin with a decontaminated cover as an identifying agent when a canister gas mask is used.

EYE EXPOSURE

Severe eye exposure when working with this fumigant. Exposure of eyes to vapors may be extremely tender and painful.

Use of eye protection flush eyes with clean water.

SKIN EXPOSURE

Do not use containers or application equipment made of magnesium, aluminum or zinc alloys. Under certain conditions this fumigant may be severely corrosive to such metals. Do not permit water to be used to clean fumigant pressure system or application equipment. Use of oil is satisfactory for this purpose.

ENVIRONMENTAL HAZARD

This fumigant is toxic to fish and wildlife. It should not be discharged where it will drain into lakes, streams, ponds, or public water. Do not contaminate water by washing of equipment or disposal of wastes.

CHEMICAL HAZARD

Do not use containers or application equipment made of magnesium, aluminum or zinc alloys. Under certain conditions this fumigant may be severely corrosive to such metals. Do not permit water to be used to clean fumigant pressure system or application equipment. Use of oil is satisfactory for this purpose.

**Technical
CHLOROPICRIN**

ACTIVE INGREDIENTS		
CHLOROPICRIN	99.4%	
INERT INGREDIENTS	0.6%	
TOTAL	100.0%	

KEEP OUT OF REACH OF CHILDREN

DANGER POISON



SEND FOR A DOCTOR IMMEDIATELY
IN CASE OF EXPOSURE

STATEMENT OF PRACTICAL TREATMENT

IF INHALED: Remove Victim To Fresh Air Immediately. Keep calm, lying Down And Warm. Give Artificial Respiration If Breathing Has Stopped. Call Physician Immediately.

IF ON SKIN: Remove All Contaminated Clothing And Shoes Immediately. Wash Exposed Areas Thoroughly With Soap and Water. If A Kiss Or Blister Develops Call Medical Attention. Clean Or Wash Contaminated Clothing Before Re-use. Do Not Re-use Clothing Or Shoes Until Free Of Chemical Odor.

IF IN EYES: Flush With Running Water For At Least 15 Minutes. Call Medical Attention Promptly.

See Side Panel for Additional Precautionary Statements

NET CONTENTS kg.

Sold By

TRINITY MANUFACTURING, INC.
11 E. V. Hogan Drive • Hamlet, NC 28345

E.P.A. EST. 4606-C1-06
E.P.A. REG. NO. 58266-04-62341

STORAGE AND DISPOSAL

STORAGE

Store in a cool, dry, well-ventilated area under lock and key. Post as a pesticide storage area. Do not contaminate water, food, or feed by storage or disposal. Persons working or handling containers should wear protective clothing. Open container only in a well-ventilated area wearing protective clothing, and respiratory protection if necessary.

RETURN OF CYLINDERS

Cylinders are the property of:
TRINITY MANUFACTURING, INC.
11 E. V. Hogan Drive • Hamlet, NC 28345

and should be returned promptly by collect auto freight.

1. When a cylinder is empty, the valve should be closed, the safety cap screwed onto the valve outlet, and the protection bonnet replaced prior to its return to the shipper.
2. Do not ship cylinders without safety caps or valve protection bonnets.
3. When a cylinder is partially full and there is no further requirement for the product, contact TRICAL for return instructions.
4. Containers should never be refilled by the consumer or used for any other product or purpose.

SHIPPING

This fumigant is classified in the U.S. Department of Transportation Hazardous Materials Regulations as Chloropicrin Liquid class "B" poison and no exemptions from specifications, packaging, marking, and labeling are allowed. Describe empty cylinders as having last contained Chloropicrin Liquid. Do not ship with food, feeds, or clothing.

HANDLING

1. The valve protection bonnet and safety cap should be removed only when fumigant is about to be removed from the cylinder. The safety cap and valve protection bonnet must be replaced when the cylinder is not in use.
2. Cylinders should never be subjected to rough handling or to abnormal mechanical shock such as dropping, bumping, dragging, or sliding.
3. Ropes, slings, hooks, tongs, and similar handling devices should not be used for unloading cylinders.
4. A suitable hand truck, fork truck, or similar device to which the cylinders can be firmly secured should be used for transporting the heavier cylinders.

SPILL OR LEAK PROCEDURE

Evacuate immediate area of spill or leak. Use SCBA combination air-supplied respirator, or approved canister respirator for entry into affected area to correct problem. Move leaking or damaged containers outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spilled material to evaporate, or to absorb onto vermiculite, dry sand, earth, or similar absorbent material, which may be disposed of on site or at an approved disposal facility. Do not permit entry into spill area or cleanup by unprotected persons until concentration of chloropicrin is determined to be less than 0.1 ppm.

DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or residue 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.

DIRECTIONS FOR USE

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

FOR MANUFACTURING PESTICIDE FORMULATIONS

This product may be used for the manufacture of pesticide formulations for preplant soil fumigation of terrestrial food crops, ornamentals and nursery beds; and for greenhouse preplant soil fumigation of food crops, ornamentals and nursery beds.

BEST COPY AVAILABLE

Technical CHLOROPICRIN

ACTIVE INGREDIENTS	
CHLOROPICRIN	99.4%
INERT INGREDIENTS	0.6%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN

ANGER  **POISON**

SEND FOR A DOCTOR IMMEDIATELY
IN CASE OF EXPOSURE

STATEMENT OF PRACTICAL TREATMENT

INHALED - Remove victim to Fresh Air immediately. Keep lying Down And Warm. Give Artificial Respiration if Breathing Has Stopped. Call Physician immediately.

ON SKIN - Remove All Contaminated Clothing And Shoes Immediately. Wash Exposed Areas Thoroughly With Soap and Water. A Red Itch May Develop. Get Medical Attention. Do Not Launder Contaminated Clothing Before Re-use. Do Not Use Clothing Or Shoes Until Free Of Chemical Odor.

IN EYES - Flush With Running Water For At Least 15 Minutes. Get Medical Attention Promptly.

See Side Panel For Additional Precautionary Statements

NET CONTENTS kg.
Sold By

TRINITY MANUFACTURING, INC.
V. Hogan Drive • Hamlet, NC 28345

E.P.A. EST. 4606-C1-06
E.P.A. REG. NO. 58266-04-62341

STORAGE AND DISPOSAL

STORAGE

Store in a cool, dry, well-ventilated area under lock and key. Treat as a pesticide storage area. Do not contaminate water, food, or feed by storage or disposal. Persons saving or handling containers should wear protective clothing. Open containers only in a well-ventilated area wearing protective clothing, and respiratory protection if necessary.

RETURN OF CYLINDERS

Cylinders are the property of:

TRINITY MANUFACTURING, INC.

11 E. V. Hogan Drive • Hamlet, NC 28345

- and should be returned promptly by collect auto freight
1. When a cylinder is empty, the valve should be closed, the safety cap screwed onto the valve outlet, and the protection bonnet replaced prior to its return to the shipper.
 2. Do not ship cylinders without safety caps or valve protection bonnets.
 3. When a cylinder is partially full and there is no further requirement for the product, contact TRICAL for return instructions.
 4. Containers should never be refilled by the consumer or used for any other product or purpose.

SHIPPING

This fumigant is classified in the U.S. Department of Transportation Hazardous Materials Regulations as Chloropicrin Liquid class "8" poison and no exemptions from specifications, packaging, marking, and labeling are allowed. Describe empty cylinders as having last contained Chloropicrin Liquid. Do not ship with food, feeds, or clothing.

HANDLING

1. The valve protection bonnet and safety cap should be removed only when fumigant is about to be removed from the cylinder. The safety cap and valve protection bonnet must be replaced when the cylinder is not in use.
2. Cylinders should never be subjected to rough handling or to abnormal mechanical shock such as dropping, bumping, dragging, or sliding.
3. Ropes, slings, hooks, tongs, and similar handling devices should not be used for unloading cylinders.
4. A suitable hand truck, fork truck, or similar device to which the cylinders can be firmly secured should be used for transporting the heavier cylinders.

SPILL OR LEAK PROCEDURE

Evacuate immediate area of spill or leak. Use SCBA combination air-supplied SCBA respirator, or approved canister respirator for entry into affected area to correct problem. Move leaking or damaged containers outdoors or to an isolated location, observing strict safety precautions. Work upwind if possible. Allow spilled material to evaporate, or to absorb onto vermiculite, dry sand, earth, or similar absorbent material which may be disposed of on site or at an approved disposal facility. Do not permit entry into spill area or cleanup by unprotected persons until concentration of chloropicrin is determined to be less than 0.1 ppm.

DISPOSAL

Do not contaminate water, food or feed by storage or 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.

DIRECTIONS FOR USE

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

FOR MANUFACTURING PESTICIDE FORMULATIONS

This product may be used for the manufacture of pesticide formulations for preplant soil fumigation of terrestrial food crops, ornamentals and nursery beds; and for greenhouse preplant soil fumigation of food crops, ornamentals and nursery beds.

BEST COPY AVAILABLE

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:

DEC 12 1985
by the Federal Insecticide,
Fungicide and Rodenticide Act of
1974 for the pesticide
under EPA Reg. No.

62431-15



CHLOROPICRIN
LIQUID
UN 1580