

62719-302

11/18/2008

Page 1 of 32



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Bruce Houtman
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

— NOV 18 2008

Subject: Telone C-35
EPA Registration No. 62719-302
Your submission dated: January 11, 2008
Decision No. S823005

Dear Mr. Houtman:

The label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable, provided that the changes listed below are made.

- 1) Under "General Use Precautions" on page 24, change "Dnot formulate and/or tank mix this product into other end-use agricultural products" to read "Do not formulate and/or tank mix this product into other end-use agricultural products".
- 2) Move the last 5 sentences under the "Environmental Hazards" Section on page 23 to the "Directions for Use, General Precautions" Section of the label as they are restrictions concerning application and must be located in that section of the label.
- 3) On page 30, under "Inherent Risks of Use", revise the last sentence to read "To the extent permitted by law, all such risks shall be assumed by the buyer."
- 4) On page 30, under "Limitation of Remedies", revise the last sentence in the second paragraph to read "To the extent permitted by law, Dow AgroScience shall not be liable for consequential or incidental damages and losses".
- 5) On page 28 of your product label, make the following changes:
 - a) Revise the second bullet to read "Do not expose rigid PVC to undiluted Telone C-35 or more than 1500 ppm of Telone C-35 in the undiluted form".
 - b) Revise the sentence "The following materials are not recommended for use with Telone C-35" to read "The following materials may not be used with Telone C-35:"

2732

c) Revise the 4th bullet to read "Buna-N, neoprene and fiberglass have the potential to disintegrate and may not be used with Telone C-35".

If you have any questions, please contact Tracy Keigwin of my team by phone at (703) 305-6605 or via email at keigwin.tracy@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)

Enclosure

| Registration Division (7505P) | | CONCURRENCES | | | | | |
|-------------------------------|---------------|--------------|--|--|--|--|--|
| SYMBOL < | 7505P | | | | | | |
| SURNAME < | Tracy Keigwin | | | | | | |
| DATE < | Nov 4, 2008 | | | | | | |

3. Handlers in Treated Area 1 to 5 Days After Application

Only the following handler tasks may be performed in the treated area within 5 days after the application is complete:

- Assessing/adjusting the soil seal
- Assessing pest control, application technique, or application efficacy
- Sampling air or soil for this product
- Removing tarp or plastic film

All other tasks are prohibited until the 5-day period has expired.

Handlers in treated area 1 to 5 days after application must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants
- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

4. Handlers Exposed to High Concentrations

Handlers exposed to high airborne concentrations of this product, such as cleanup following large spills and exposure to this product in poorly ventilated areas, must wear at minimum:

- Chemical-resistant suit
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear
- Supplied-air respirator with MSHA/NIOSH approval number prefix TC-19C or self-contained breathing apparatus (SCBA) with MSHA/NIOSH approval number prefix TC-13F. See further respirator requirements in the User Safety Requirements section on this label.

Note: In-tank cleaning of bulk tanks must be performed only by persons who have been specifically trained for this activity. Refer to OSHA 29 CFR Part 1910.146.

Engineering Controls

Mechanical Transfer System: Personal protective equipment specified for Direct Contact Activities must be worn by the operator of the mechanical transfer system. The operator of the mechanical transfer system must follow instructions on proper operation of the system found in the "Telone Soil Fumigants - A Guide to Application" manual. Contact your distributor for Telone C-35 for more information or for these materials.

End-Row Spillage Control: The dispensing system must shut off the feed stream when chisels are raised out of the ground. Do not stop or park near any area where dribble from chisel tips has fallen. The applicator must follow instructions on proper operation and maintenance of the system found in the

7 7 32

"Telone Soil Fumigants - A Guide to Application" manual. Contact your distributor for Telone C-35 for more information or for these materials.

- A flow shutoff device must be placed as close as is technically feasible to the fluid discharge point. This can be a ball, poppet, or diaphragm check valve, or full flow shutoff device such as an electric or pneumatically actuated valve.
- Service any system immediately if continuous drip occurs.
- If mechanical check valves and orifices are used, place the check valve above the orifice. Also, isolate the check valve from upstream pressure by installing a main line shut off or bypass valve prior to the manifold.
- Pipe diameter from check valve to injection point must not exceed 1/4 inches ID National Pipe Standard (NPS). Preferably, use the smallest diameter pipe or tubing possible which achieves the required flow rate.
- Alternative end-row spillage devices or methods, such as, but not limited to, micro-bore restricted flow tubing or line purge systems may be used if they provide equal or superior control versus check valves.

With all bulk and non-bulk containers, Telone C-35 must be transferred through connecting hoses, pipes, and/or couplings sufficiently tight to prevent workers or other persons from coming in contact with liquid Telone C-35.

- All hoses, piping, and tanks used in connection with Telone C-35 shall be of the type appropriate for use under the pressure and vacuum conditions to be encountered.
- External sight gauges shall be equipped with valves so that pipes to sight gauge can be shut off in case of breakage or leakage.
- The mechanical transfer system must be adequate to make necessary measurements of the pesticide being used.
- Shut-off devices must be installed on the exit end of all hoses and at all disconnect points to prevent leakage of Telone product when the transfer is stopped and hose is removed or disconnected. A dry coupler that will minimize pesticide leakage must be installed at the disconnect point.
- The pressure in hoses used to move Telone C-35 beyond a pump must not exceed the manufacturer's maximum pressure specification.

User Safety Requirements

- 1. Respirator Requirements:** When a respirator is required for use with this product, the following criteria must be met:
 - a. Cartridges or canisters must be replaced daily or when odor or irritation from this product becomes apparent, whichever is sooner.
 - b. Respirators must be fit-tested and fit-checked using a program that conforms to OSHA's requirements (described in 29 CFR Part 1910.134).
 - c. Respirator users must be trained using a program that conforms to OSHA's requirements (described in 29 CFR Part 1910.134).
 - d. Respirator users must be examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn.
- 2. Never fumigate alone:** It is imperative to always have an assistant and proper protective equipment in case of accidents.
- 3. Driver's Responsibilities:** Drivers of application equipment must advise other workers of all precautions and procedures. In addition, drivers must instruct their helpers in the mechanical operation of the tractor and how to safely work with the tractor and driver while fumigating.
- 4. Dispose of Contaminated Clothing:** Discard clothing and other absorbent materials that have been drenched or heavily contaminated with liquid from this product. Do not reuse them.
- 5. Clean and Maintain PPE:** Follow manufacturer'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. Wash PPE after each day's use.

- 6. Contact with Mouth:** Never siphon this product by mouth or use mouth to blow out clogged lines, nozzles, etc.
- 7. Heat Illness Avoidance:** Use measures to avoid or minimize heat illness while using this product. These measures include gradual adjustment to heat and respirator stress, fans for cooling, cooling vests, frequent breaks to cool down, frequent intake of drinking water, and maintaining weight from day to day.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.

If on skin or clothing: Immediately flush skin with plenty of water for at least 15-20 minutes while removing contaminated clothing and shoes. If water is not immediately available, remove excess chemical from skin with sorbent material such as towel or dry soil, then proceed at once to location where water is available and thoroughly wash contaminated skin with plenty of water. 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 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Note to physician: Because rapid absorption may occur through lungs if product is aspirated and cause systemic effects, the decision to induce vomiting or not should be made by a physician. If lavage is performed, endotracheal and/or esophageal control is suggested. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach.

Environmental Hazards

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 contaminate water when disposing of equipment rinsate. See Storage and Disposal section. In case of spills properly dispose of contaminated materials.

Groundwater advisory: 1,3-dichloropropene is known to move through soil and under certain conditions has the potential to reach groundwater as a result of agricultural use. Application in areas where soils are permeable and groundwater is near the surface could result in groundwater contamination. Do not apply within 100 feet of any well used for potable water. Do not apply this product within 100 feet from the edge of karst topographical features. Karst topography is identified from landscape features that result from the dissolving activity of water in carbonate rock formations (limestone, dolomite and marble). Surface features that are associated with karst topography include sinkholes, caverns, springs, and sinking or disappearing streams. In North Dakota, South Dakota, Wisconsin, Minnesota, New York, Maine, New Hampshire, Vermont, Massachusetts, Utah, and Montana: Where groundwater aquifers exist at a depth of 50 feet or less from the surface, do not apply this product where soils are Hydrologic Group A.

Physical or Chemical Hazards

11 8 32

- The use of this product may be hazardous to your health. This product contains 1,3-dichloropropene, which has been determined to cause tumors in laboratory animals. Risks can be reduced by exactly following directions for use, precautionary statements, and by wearing the personal protective equipment specified in this labeling.
- This fumigant has the capacity to cause marked irritation to the upper respiratory tract. A strong lachrymator (tear-producing eye irritant). Low concentrations are capable of causing painful eye irritation. The effect may be so powerful that a person may become temporarily blinded and panic-stricken. That, in turn, may lead to accidents.

Air Concentration Level

The acceptable air concentration level for persons exposed to chloropicrin is 0.1 ppm (0.7 mg/M³). The air concentration level is measured by a direct reading detection device, such as a Matheson-Kitagawa, Draeger, or Sensidyne.

Personal Protective Equipment (PPE)

Chemical-Resistant Materials: Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category H on an EPA chemical resistance category selection chart. PPE constructed of saranex, neoprene, and chlorinated polyethylene provide short-term contact or splash protection against liquid in this product. Longer-term protection is provided by PPE constructed of viton, Teflon, and EVAL barrier laminates (for example, responder suits manufactured by Life-guard or silvershield gloves manufactured by North). Where chemical-resistant materials are required, leather, canvas, or cotton materials offer no protection from this product and must not be worn as the sole article of protection when contact with this product is possible. Where coveralls are required, they must be loose-fitting and constructed of woven fabrics (e.g., tight knit cotton or cotton/polyester), non-woven fabrics (e.g., tyvek or sontara), or fabrics containing microporous Teflon.

1. Handlers Performing Tasks with Liquid Contact Potential

Tasks with liquid contact potential are tasks performed outdoors or in a well-ventilated area. They include:

- Equipment calibration or adjustment
- Equipment clean-up and repair
- Product sampling
- Any activity less than 6 feet from an unshielded pressurized hose containing this product
- Rinsate disposal
- Fumigant transfer
- Clean-up of small spills
- Preparing containers for aeration
- Any other task not otherwise listed in (2), (3), or (4) below

Handlers performing tasks with liquid contact potential must wear at minimum:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). See further respirator requirements in the User Safety Requirements section on this label.
- If air concentrations of chloropicrin exceed 0.1 ppm, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

2a. Handlers Performing Tasks with No Liquid Contact Potential - Broadcast Applications, In-Bed Applications or Applications at the Time of Bedding Except as in 2b.

Tasks with no liquid contact potential are tasks performed outdoors or in a well-ventilated area.

These tasks include:

- Tractor driving
- Soil sealing
- Field activities on the day of application that do not disrupt the soil at the depth of liquid injection

Handlers performing tasks with no liquid contact potential must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants
- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

2b. Handlers Performing Tasks with No Liquid Contact Potential - Pre-Bed, Row Product Applications (e.g., Yetter Rig)

Tasks with no liquid contact potential are tasks performed outdoors or in a well-ventilated area.

These tasks include:

- Tractor driving
- Soil sealing
- Field activities on the day of application that do not disrupt the soil at the depth of liquid injection

Handlers performing tasks with no liquid contact potential must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants
- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

3. Handlers in Treated Area 1 to 5 Days After Application

Only the following handler tasks may be performed in the treated area within 5 days after the application is complete:

- Assessing/adjusting the soil seal
- Assessing pest control, application technique, or application efficacy
- Sampling air or soil for this product
- Removing tarp or plastic film

All other tasks are prohibited until the 5-day period has expired.

Handlers in treated area 1 to 5 days after application must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants
- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

4. Handlers Exposed to High Concentrations

Handlers exposed to high airborne concentrations of this product, such as cleanup following large spills and exposure to this product in poorly ventilated areas, must wear at minimum:

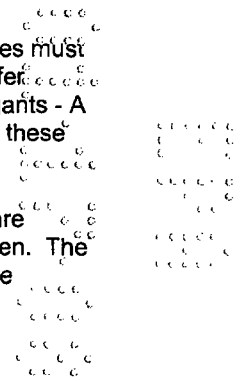
- Chemical-resistant suit
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear
- Supplied-air respirator with MSHA/NIOSH approval number prefix TC-19C or self-contained breathing apparatus (SCBA) with MSHA/NIOSH approval number prefix TC-13F. See further respirator requirements in the User Safety Requirements section on this label.

Note: In-tank cleaning of bulk tanks must be performed only by persons who have been specifically trained for this activity. Refer to OSHA 29 CFR Part 1910.146.

Engineering Controls

Mechanical Transfer System: Personal protective equipment specified for Direct Contact Activities must be worn by the operator of the mechanical transfer system. The operator of the mechanical transfer system must follow instructions on proper operation of the system found in the "Telone Soil Fumigants - A Guide to Application" manual. Contact your distributor for Telone C-35 for more information or for these materials.

End-Row Spillage Control: The dispensing system must shut off the feed stream when chisels are raised out of the ground. Do not stop or park near any area where dribble from chisel tips has fallen. The applicator must follow instructions on proper operation and maintenance of the system found in the



"Telone Soil Fumigants - A Guide to Application" manual. Contact your distributor for Telone C-35 for more information or for these materials.

- A flow shutoff device must be placed as close as is technically feasible to the fluid discharge point. This can be a ball, poppet, or diaphragm check valve, or full flow shutoff device such as an electric or pneumatically actuated valve.
- Service any system immediately if continuous drip occurs.
- If mechanical check valves and orifices are used, place the check valve above the orifice. Also, isolate the check valve from upstream pressure by installing a main line shut off or bypass valve prior to the manifold.
- Pipe diameter from check valve to injection point must not exceed 1/4 inches ID National Pipe Standard (NPS). Preferably, use the smallest diameter pipe or tubing possible which achieves the required flow rate.
- Alternative end-row spillage devices or methods, such as, but not limited to, micro-bore restricted flow tubing or line purge systems may be used if they provide equal or superior control versus check valves.

With all bulk and non-bulk containers, Telone C-35 must be transferred through connecting hoses, pipes, and/or couplings sufficiently tight to prevent workers or other persons from coming in contact with liquid Telone C-35.

- All hoses, piping, and tanks used in connection with Telone C-35 shall be of the type appropriate for use under the pressure and vacuum conditions to be encountered.
- External sight gauges shall be equipped with valves so that pipes to sight gauge can be shut off in case of breakage or leakage.
- The mechanical transfer system must be adequate to make necessary measurements of the pesticide being used.
- Shut-off devices must be installed on the exit end of all hoses and at all disconnect points to prevent leakage of Telone product when the transfer is stopped and hose is removed or disconnected. A dry coupler that will minimize pesticide leakage must be installed at the disconnect point.
- The pressure in hoses used to move Telone C-35 beyond a pump must not exceed the manufacturer's maximum pressure specification.

User Safety Requirements

- 1. Respirator Requirements:** When a respirator is required for use with this product, the following criteria must be met:
 - a. Cartridges or canisters must be replaced daily or when odor or irritation from this product becomes apparent, whichever is sooner.
 - b. Respirators must be fit-tested and fit-checked using a program that conforms to OSHA's requirements (described in 29 CFR Part 1910.134).
 - c. Respirator users must be trained using a program that conforms to OSHA's requirements (described in 29 CFR Part 1910.134).
 - d. Respirator users must be examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn.
- 2. Never fumigate alone:** It is imperative to always have an assistant and proper protective equipment in case of accidents.
- 3. Driver's Responsibilities:** Drivers of application equipment must advise other workers of all precautions and procedures. In addition, drivers must instruct their helpers in the mechanical operation of the tractor and how to safely work with the tractor and driver while fumigating.
- 4. Dispose of Contaminated Clothing:** Discard clothing and other absorbent materials that have been drenched or heavily contaminated with liquid from this product. Do not reuse them.
- 5. Clean and Maintain PPE:** Follow manufacturer'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. Wash PPE after each day's use.

16 8 32

Combustible. Do not use or store near heat or open flame.

Agricultural Use Requirements
 Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Storage and Disposal
 Do not contaminate water, food or feed by storage and disposal.
Pesticide Storage: Store in tightly-closed original container away from dwellings. Prolonged exposure of container to direct sunlight must be avoided. Do not allow contamination of seeds, plants, fertilizers, or other pesticide chemicals.
Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide and rinsates 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.
 Because Telone C-35 is corrosive under certain conditions, flush all application equipment with fuel oil, kerosene or a similar type of petroleum solvent immediately after use. Fill pumps and meters with new motor oil or a 50% motor oil/fuel oil mixture before storing. **Do not use water.** Dispose of rinsate by applicable Federal, state and local regulations. Never introduce rinsate or unused Telone C-35 into surface or underground water supplies.
Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.
 Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

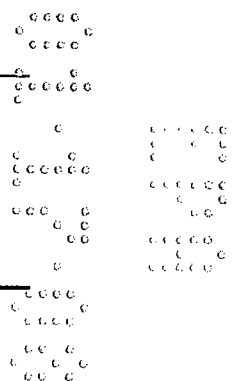
Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-302

EPA Est. _____

®Trademark of Dow AgroSciences LLC
Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Contents _____



- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). See further respirator requirements in the User Safety Requirements section on this label.
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

2a. Handlers Performing Tasks with No Liquid Contact Potential - Broadcast Applications, In-Bed Applications or Applications at the Time of Bedding Except as In 2b.

Tasks with no liquid contact potential are tasks performed outdoors or in a well-ventilated area. These tasks include:

- Tractor driving
- Soil sealing
- Field activities on the day of application that do not disrupt the soil at the depth of liquid injection

Handlers performing tasks with no liquid contact potential must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants
- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

2b. Handlers Performing Tasks with No Liquid Contact Potential - Pre-Bed, Row Product Applications (e.g., Yetter Rig)

Tasks with no liquid contact potential are tasks performed outdoors or in a well-ventilated area. These tasks include:

- Tractor driving
- Soil sealing
- Field activities on the day of application that do not disrupt the soil at the depth of liquid injection

Handlers performing tasks with no liquid contact potential must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants

- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

3. Handlers in Treated Area 1 to 5 Days After Application

Only the following handler tasks may be performed in the treated area within 5 days after the application is complete:

- Assessing/adjusting the soil seal
- Assessing pest control, application technique, or application efficacy
- Sampling air or soil for this product
- Removing tarp or plastic film

All other tasks are prohibited until the 5-day period has expired.

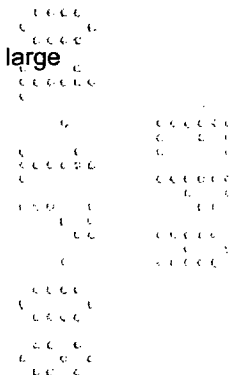
Handlers in treated area 1 to 5 days after application must wear at minimum:

- Loose fitting or well ventilated long-sleeved shirt and long pants
- Shoes and socks
- A face shield or safety glasses with brow and temple shields (do not wear chemical goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- **If air concentrations of chloropicrin exceed 0.1 ppm**, handlers must wear a full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). A respirator is not required if the occupants are within an enclosed cab that is in conformance with one of the following: 1) ANSI/ASAE S525-1.1 MAY98 sections 7.1.5, 7.1.7, 7.2.3, and 9, or 2) the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides -- 40 CFR 170.240(d)(5). The cab must be equipped with a vapor-adsorptive filter containing a minimum of 1000 grams activated charcoal. The filter must be changed after no more than 50 hours of application time. See further respirator requirements in the User Safety Requirements section on this label.
- In addition, the PPE specified in (1) for activities with direct liquid contact potential must be immediately available and must be worn if the handler is to perform any direct-contact activity with a potential for liquid contact

4. Handlers Exposed to High Concentrations

Handlers exposed to high airborne concentrations of this product, such as cleanup following large spills and exposure to this product in poorly ventilated areas, must wear at minimum:

- Chemical-resistant suit
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear



- Supplied-air respirator with MSHA/NIOSH approval number prefix TC-19C or self-contained breathing apparatus (SCBA) with MSHA/NIOSH approval number prefix TC-13F. See further respirator requirements in the User Safety Requirements section on this label.

Note: In-tank cleaning of bulk tanks must be performed only by persons who have been specifically trained for this activity. Refer to OSHA 29 CFR Part 1910.146.

Engineering Controls

Mechanical Transfer System: Personal protective equipment specified for Direct Contact Activities must be worn by the operator of the mechanical transfer system. The operator of the mechanical transfer system must follow instructions on proper operation of the system found in the "Telone Soil Fumigants - A Guide to Application" manual. Contact your distributor for Telone® C-35 soil fungicide and nematicide for more information or for these materials.

End-Row Spillage Control: The dispensing system must shut off the feed stream when chisels are raised out of the ground. Do not stop or park near any area where dribble from chisel tips has fallen. The applicator must follow instructions on proper operation and maintenance of the system found in the "Telone Soil Fumigants - A Guide to Application" manual. Contact your distributor for Telone C-35 for more information or for these materials.

- A flow shutoff device must be placed as close as is technically feasible to the fluid discharge point. This can be a ball, poppet, or diaphragm check valve, or full flow shutoff device such as an electric or pneumatically actuated valve.
- Service any system immediately if continuous drip occurs.
- If mechanical check valves and orifices are used, place the check valve above the orifice. Also, isolate the check valve from upstream pressure by installing a main line shut off or bypass valve prior to the manifold.
- Pipe diameter from check valve to injection point must not exceed 1/4 inches ID National Pipe Standard (NPS). Preferably, use the smallest diameter pipe or tubing possible which achieves the required flow rate.
- Alternative end-row spillage devices or methods, such as, but not limited to, micro-bore restricted flow tubing or line purge systems may be used if they provide equal or superior control versus check valves.

With all bulk and non-bulk containers, Telone C-35 must be transferred through connecting hoses, pipes, and/or couplings sufficiently tight to prevent workers or other persons from coming in contact with liquid Telone C-35.

- All hoses, piping, and tanks used in connection with Telone C-35 shall be of the type appropriate for use under the pressure and vacuum conditions to be encountered.
- External sight gauges shall be equipped with valves so that pipes to sight gauge can be shut off in case of breakage or leakage.
- The mechanical transfer system must be adequate to make necessary measurements of the pesticide being used.
- Shut-off devices must be installed on the exit end of all hoses and at all disconnect points to prevent leakage of Telone when the transfer is stopped and hose is removed or disconnected. A dry coupler that will minimize pesticide leakage must be installed at the disconnect point.
- The pressure in hoses used to move Telone C-35 beyond a pump must not exceed the manufacturer's maximum pressure specification.

| |
|--|
| <p>User Safety Requirements</p> <p>1. Respirator Requirements: When a respirator is required for use with this product, the following criteria must be met:</p> <p>a. Cartridges or canisters must be replaced daily or when odor or irritation from this product becomes apparent, whichever is sooner.</p> |
|--|

- b. Respirators must be fit-tested and fit-checked using a program that conforms to OSHA's requirements (described in 29 CFR Part 1910.134).
 - c. Respirator users must be trained using a program that conforms to OSHA's requirements (described in 29 CFR Part 1910.134).
 - d. Respirator users must be examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn.
2. **Never fumigate alone:** It is imperative to always have an assistant and proper protective equipment in case of accidents.
 3. **Driver's Responsibilities:** Drivers of application equipment must advise other workers of all precautions and procedures. In addition, drivers must instruct their helpers in the mechanical operation of the tractor and how to safely work with the tractor and driver while fumigating.
 4. **Dispose of Contaminated Clothing:** Discard clothing and other absorbent materials that have been drenched or heavily contaminated with liquid from this product. Do not reuse them.
 5. **Clean and Maintain PPE:** Follow manufacturer'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. Wash PPE after each day's use.
 6. **Contact with Mouth:** Never siphon this product by mouth or use mouth to blow out clogged lines, nozzles, etc.
 7. **Heat Illness Avoidance:** Use measures to avoid or minimize heat illness while using this product. These measures include gradual adjustment to heat and respirator stress, fans for cooling, cooling vests, frequent breaks to cool down, frequent intake of drinking water, and maintaining weight from day to day.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.

If on skin or clothing: Immediately flush skin with plenty of water for at least 15-20 minutes while removing contaminated clothing and shoes. If water is not immediately available, remove excess chemical from skin with sorbent material such as towel or dry soil, then proceed at once to location where water is available and thoroughly wash contaminated skin with plenty of water. 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 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Note to physician: Because rapid absorption may occur through lungs if product is aspirated and cause systemic effects, the decision to induce vomiting or not should be made by a physician. If lavage is performed, endotracheal and/or esophageal control is suggested. Danger from lung aspiration must be weighed against toxicity when considering emptying the stomach.

Environmental Hazards

Note: For control of symphylans (garden centipedes) or suppression of wireworms, consult the Soil Insects section below for more specific directions and application rates.

- ¹ Rates given may be concentrated in the row, but in no case should the amount applied per acre exceed the maximum broadcast application rates [gallons per acre (gpa)] given in the above table.
- ² Potatoes: Before fumigation, soil sampling for the type and number of pests present is recommended and can help to determine the need for additional treatment with a contact nematicide. Preharvest tuber sampling for nematodes also is recommended. If the nematode population is high enough to damage the crop, potatoes can be harvested early. Do not store potatoes with a detectable nematode infestation. Row treatment is not recommended for potatoes in irrigated areas of western and northwestern states.
- ³ For cyst-forming nematodes increase dosage to 26 gpa.
- ⁴ When using the coultter system (e.g., Yetter 30-inch Avenger) in moderate to heavy disease pressure, use the maximum rate of Telone C-35 followed by chloropicrin in-bed. Consult your local certified dealer for rate recommendations.
- ⁵ For muck soils containing less than 30% organic matter use 26 gpa. **In New York:** for high organic matter soils, use up to 49 gpa.
- ⁶ Citrus Fruits: For burrowing nematode control, inject Telone C-35 on 18-inch centers at least 12 inches deep. For buffers within existing groves or for tree planting sites within existing groves, do not apply within 5 feet of living trees. Keep the field free of plants susceptible to burrowing nematodes for 2 years before replanting to citrus.
- ⁷ Tree Planting Sites in the Western U.S.: Use 39 fl oz (2.4 pints) of Telone C-35 by applying the fumigant at a single point in the center of each planting site at a depth of 5 feet below the original soil surface, or into at least 3 points per planting site, at a depth of 3 feet below the original soil surface. The recommended procedure is to prepare the site by backhoeing to break up restrictive soil layers that may retard fumigant movement. The backhoe site should be dug in the approximate dimensions of 10 x 10 x 10 feet. Backfill the hole and the fumigant applied using a closed-system application tube. For sites where no restrictive soil layers are present, the fumigant can be applied to a depth of 5 feet using an injection auger. If backhoe procedure is not used, product performance may be reduced. To prevent phytotoxicity, assure that the chemical has dissipated completely before planting. Dissipation is slower in cold, wet soils. Prepare and treat planting sites in the fall and plant in the spring. In other areas of the U.S., the above may be followed. Regardless of method, ensure thorough fumigation of the desired area. Do not place in groundwater.

Control of Soil Insects

Symphylans (Garden Centipedes): Use Telone C-35 for treatment of soil to be planted to crops where these pests have been shown to be a problem. Apply the fumigant only as a broadcast treatment at the rate of 27.6 to 53.8 gpa. Applications made during late summer or early fall when the soil is warm are recommended.

Wireworms: Use Telone C-35 for treatment of soil to be planted to crops where these pests have been shown to be a problem. Apply the fumigant as a broadcast treatment at 27.6 gpa by injection at least 14 inches below the final soil surface.

Supplemental labels are available for certain crops in selected geographies. Refer to these supplemental labels for specific use directions. Consult a Dow AgroSciences representative or visit the Dow AgroSciences website at www.dowagro.com for additional information.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

