

62719-348

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

CERTIFIED MAIL

Dave Barnekow  
Dow AgroSciences, LLC.  
9330 Zionsville Road 308/2E  
Indianapolis, IN 46268

APR 30 2010

Subject: InLine®  
EPA Reg. No. 62719-348  
Pre-RED Mitigation Amendment dated October 19, 2009  
EPA Decision Number 430173

Dear Mr. Barnekow:

The amended label referred to above, submitted in connection with reregistration of chloropicrin under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following label revisions are made and the following conditions are met:

**LABEL REVISIONS**

1. On page 1, move the First aid statement and the Note to physician above the heading "Precautionary Statements".
2. On page 2, add the signal word "DANGER" above the phrase "Hazardous Liquid and Vapor".
3. On page 2, revise the sixth main bullet to read "If sensory irritation (tearing, burning of the eyes or nose) is experienced and handlers remain in the application block, handlers must wear at a minimum either:"
4. On pages 3 and 10, revise the last sentence under number 1 to read "See Directions for Use, Protection for Handlers, Respiratory Protection and Stop Work Triggers, number 1, Handlers Performing Mechanical Transfer of Product – Closed Delivery System for when a full-face respirator is required."
5. On page 3, revise the title of number 2 to read "**When Performing Tasks With Liquid Contact Potential, All Handlers (Including Applicators) must wear at a minimum:**"
6. On page 3, revise the eighth main bullet to read "If sensory irritation (tearing, burning of the eyes or nose) is experienced and handlers remain in the application block, handlers must wear at a minimum either:"

7. On pages 3 and 10, revise the last sentence under number 2 to read “See Directions for Use, Protection for Handlers, Respiratory Protection and Stop Work Triggers, number 2, While Performing Tasks With Liquid Contact Potential, All Handlers (Including Applicators) for when a full-face respirator is required.”
8. On pages 3 and 10, revise the last sentence under number 3 to read “See Directions for Use, Protection for Handlers, Respiratory Protection and Stop Work Triggers, number 3, Handlers in Treated Area Within 5 Days After Application for respirator monitoring and stop work requirements.”
9. On pages 3 and 10 under number 4, add the following as a bullet after the second bullet, “Do not wear jewelry, gloves, goggles, tight clothing, rubber protective clothing, or rubber boots when handling. Chloropicrin is heavier than air and can be trapped inside clothing and cause skin injury.”
10. On pages 3 and 10 under number 4, revise the third main bullet to read, “If sensory irritation (tearing, burning of the eyes or nose) is experienced and handlers remain in the application block, handlers must wear at a minimum either:”
11. On pages 3 and 10, revise the sentence under number 4 to read “See Directions for Use, Protection for Handlers, Respiratory Protection and Stop Work Triggers, number 4, Handlers in Treated Area Within 5 Days After Application Until the Entry Restricted Period Ends for when a full-face respirator is required.”
12. On pages 4 and 11, revise the section “IMPORTANT: For all handlers in numbers 1-4 an air-supplying respirator. . .” to read “IMPORTANT: For all handlers in numbers 1-4 a self-contained breathing apparatus (SCBA) is not permitted for routine handler tasks.”
13. On page 4 and 11, revise number 5 as follows:
  - a. the title to read, “Handlers exposed to high airborne concentrations of this product, e.g., emergencies such as a spill or leak or when corrective action is needed to reduce air levels to acceptable levels, and exposure to this product in poorly ventilated areas, must wear at a minimum:”
  - b. the last bullet under number 5 to read “A self-contained breathing apparatus (SCBA) with NIOSH approval number prefix TC-13F. See further respirator requirements in the User Safety Requirements and Directions for Use section on this label.
14. On page 5, add the heading “Directions for Use” above the Agricultural use requirements box.
15. On page 11, revise the last sentence of the last bullet under number 5 to read “See further respirator requirements in the User Safety Requirements and Directions for Use sections on this label.”

16. On page 11, move the First aid box and Note to physician to page 9 above the heading "Precautionary Statements".
17. On page 12, in the Agricultural Use Requirements box, add the following sentence after the last sentence, "PPE for Entry During the Entry Restricted Period: PPE for entry that is permitted by this labeling is listed in the Hazards to Humans and Domestic Animals section of this labeling."
18. On page 13, delete the following "Do not wear jewelry, rubber gloves, goggles, tight clothing, rubber protective clothing, or rubber boots when handling. Chloropicrin is heavier than air and can be trapped inside clothing and cause skin injury."
19. On page 14, revise the sixth paragraph under General Information section to read, "Apply InLine as a preplant application through surface and/or buried drip (drip lines buried at least 5 inches below the soil surface) irrigation systems with a tarp seal. Use of a tarp seal is mandatory for all applications of this product."
20. On page 15, revise the "Note" under the Fumigation Handlers section to read, "NOTE: See Tarp Perforation and/or Removal section on this labeling for requirements about when tarps are allowed to be perforated."
21. On pages 15 and 16, move the following paragraph "Do not apply within 100 feet of any well...where soils are Hydrologic Group A" to page 13 after the following sentence, "Before using this product, carefully read and follow all label precautions and directions."
22. On page 15, add the title, "Respiratory Protection and Stop Work Triggers" after the Protection for Handlers title.
23. On page 16, under number 1, revise the eighth main bullet to read, "Work activities can resume if all of the following conditions exist provided that a full-face air-purifying respirator is worn:"
24. On page 16, revise the title of number 2 to read "**While Performing Tasks With Liquid Contact Potential All Handlers (Including Applicators)**".
25. On page 16 under number 2, revise the first sentence to read "The following procedures must be followed to determine whether a full-face air-purifying respirator is required or if operations must cease for handlers wearing half-face respirators:"
26. On page 17 under number 2, revise the sixth main bullet to read "Handlers can remove full-face air-purifying respirators or resume work activities if all of the following conditions exist provided that a half-face air-purifying respirator is worn:"

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27. On page 17 under number 3, revise the fifth main bullet to read “Work activities can resume if all of the following conditions exist provided that a full-face air-purifying respirator is worn:”
28. On page 18 under number 4, revise the eight main bullet to read “Work activities can resume if all of the following conditions exist provided that a full-face air-purifying respirator is worn:”
29. On page 18, under Supervision of Handlers in the first paragraph, change “delivered/dispersed” to “delivered/dispensed” in the second sentence.
30. On page 19, under the Supervision of Handlers, revise the fourth paragraph to read “The certified applicator must provide **Fumigant Safe Handling** information to each handler involved in the application or confirm that each handler participating in the application has received **Fumigant Safe Handling** information in a manner they can understand within the past twelve months. **Fumigant Safe Handling** information will be provided where this product is purchased, or at [www.epa.gov/fumigantraining](http://www.epa.gov/fumigantraining).”
31. On page 19, revise the subheading and text of “Air-Rescue Device Availability” to read “AVAILABILITY OF RESPIRATORS FOR EMERGENCIES”
  - The employer of any handler must confirm that at least one self-contained breathing apparatus (SCBA) is on-site and is ready for use in case of an emergency. This must be documented in the FMP.”
32. On page 19, revise the last sentence of the last bullet under Respirator Fit Testing, Medical Qualification and Training to read “Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with the requirements.”
33. On page 21, under Weather Conditions, revise the fourth paragraph to read “Detailed local forecasts for weather conditions, wind speed, and air stagnation advisories may be obtained on-line at: <http://www.nws.noaa.gov>, or by contacting your local National Weather Service Forecasting Office.”
34. On page 21, under Soil Preparation, revise the first sentence to read “Soil must be properly prepared and at the surface generally free of large clods.”
35. On page 23, add the title, “**Compatible Materials**” directly above the following, “The following materials are recommended for use with InLine:”
36. On page 23, make the following revisions to the bullets under “The following materials must **not** be used with InLine:”
  - “Do not use containers, pumps, drip tape or other transfer or drip

equipment made of aluminum, magnesium, zinc (including galvanized), cadmium, tin and alloys, or vinyl as under certain conditions InLine may be severely corrosive to such materials. Unless referring to plasticized vinyl, vinyl and PVC are the same. PVC is listed above under Compatible Materials.

- Buna-N, neoprene and fiberglass have the potential to disintegrate and must not be used with InLine.”

37. On page 24, under Planting Interval revise “r” to “or”.
38. On page 24, under Site Specific FMP, revise the third sentence in the first paragraph to read “The FMP must be prepared by the certified applicator, the site owner/operator, registrant, or other party.”
39. On page 24, revise the third sub bullet under Applicator Information to read “pesticide applicator license and/or certificate number”.
40. On page 25, at the sixth solid bullet, revise “Air-purifying respirators, air-rescue devices, and. . .” to read “Air purifying respirators, SCBAs, and other personal protective equipment (PPE) for handlers (handler task; protective clothing; respirator make, model, type, style, and size; respirator cartridge type; respirator cartridge replacement schedule; eye protection; gloves; and other PPE)”.
41. On page 25, under Fumigant Treated Area Posting Procedures and on page 28 under Notification Requirements, capitalize each word in the following phrase, “Fumigant Treated Area”.
42. On page 26, under Authorized On Site Personnel, revise the text “For handlers designated to wear air-purifying respirators. . .” to read “For handlers designated to wear respirators (air-purifying respirator or SCBA):
  - Date of medical qualification for respirator(s) that each handler is designated to wear,
  - Date of training for respirator(s) that each handler is designated to wear, and
  - Date of fit-testing for respirator(s) that each handler is designated to wear.”
43. On page 26, under Air Monitoring plan, revise the first bullet to read “If sensory irritation is experienced, indicate whether operations will be ceased or operations will continue with an air-purifying respirator.”
44. On page 26, under Good Agricultural Practices, delete “(registrants may also include optional GAPs).”
45. On page 28 under Entry Restricted Period in the fourth bullet, delete the word “until”.
46. On page 30, revise the first paragraph to read “To the extent consistent with applicable

law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is. . .”

**CONDITIONS**

1. EPA has determined that the risk mitigation measures on the revised label for this product are necessary to adequately protect human health and the environment. Therefore, pursuant to 40 CFR § 152.130(d), EPA has decided that no product bearing previously approved labeling may be sold or distributed (release for shipment) by its registrant after December 1, 2010. Wherever state approval is required for sale or distribution of this product with this new labeling, EPA strongly encourages you to submit an application to the state authority as soon as possible. You should be aware that the Agency does not intend to modify the December 1, 2010, deadline because of any failure to obtain necessary state approvals.
2. Submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

One copy of the label stamped “Accepted with comments” is enclosed for your records. If you have any questions, please contact Andrea Carone at (703) 308-0122 or via email at [carone.andrea@epa.gov](mailto:carone.andrea@epa.gov) or contact Mary Waller at (703) 308-9354 or via email at [waller.mary@epa.gov](mailto:waller.mary@epa.gov).

Sincerely,



Mary L. Waller  
Product Manager (21)  
Fungicide Branch  
Registration Division (7504P)

Enclosure

APR 30 2010  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

InLine®

EPA Reg. No. 62719-348

## Registration Notes:

Source label text based on EPA-accepted copy dated September 30, 2009.

### Proposed changes by amendment:

1. Restricted Use Pesticide: Revised statement to comply with chloropicrin RED.
2. Sale copy: Revised text for consistency with the label for Telone C-35 and Telone EC.
3. Air Concentration Level: Deleted section.
4. PPE: (1) Deleted "Chemical-Resistant Materials" at beginning of first paragraph; (2) revised second sentence in first paragraph; (3) revised paragraph for consistency with the label for Telone C-35; (4) in #1, added "Protective eyewear (do not wear goggles)" and deleted "Face-sealing goggles" and "Full-face respirator. . . P or HE prefilter." to comply with chloropicrin RED; (5) in #1, added 10 paragraphs to comply with chloropicrin RED; (6) in #2, revised header statement to read "When handling liquid, all handlers (including applicators) must wear at a minimum: to comply with chloropicrin RED; (7) in #2, deleted first paragraph and "Handlers performing tasks with liquid contact potential must wear" to comply with chloropicrin RED; (8) in #2, added "Protective eyewear (do not wear goggles)" and deleted "A face shield or. . . chemical goggles" to comply with chloropicrin RED; (9) #2, added eight paragraphs to comply with chloropicrin RED; (10) in #3, added "must wear at a minimum" to header statement to comply with chloropicrin RED; (11) in #3, deleted first three paragraphs to comply with chloropicrin RED; (12) in #3, added five paragraphs to comply with chloropicrin RED; (13) in #4, revised header statement to read "Handlers in the treated area 5 days after application until the entry restricted period ends must wear" to comply with chloropicrin RED; (14) in #4, added 11 paragraphs to comply with chloropicrin RED; (15) in #5, added "and exposure to this product in poorly ventilated areas must wear at a minimum" to header statement; (16) in #5, in fifth bullet point deleted "MSHA" and changed "User Safety Requirements" to "Protection of Handlers" to comply with chloropicrin RED.
5. Engineering Controls: Revised first sentence for consistency with the label for Telone C-35.
6. User Safety Requirements: (1) Deleted #1 and renumbered points; (2) revised first sentence in #3; (3) in #4, added "exist" to second sentence and deleted "Wash PPE after each day's use." to comply with chloropicrin RED.
7. Environmental Hazards: Revised section to comply with chloropicrin RED.
8. Directions for Use: Added "Restricted Use Pesticide" directly underneath heading.
9. Agricultural Use Requirements: (1) In first paragraph, added "For the entry restricted. . . section of this label." to comply with chloropicrin RED; (2) deleted "Entry Restriction," "Notification and Posting," and "PPE for Reentry During the Entry Restricted Period" to comply with chloropicrin RED.
10. General Information: (1) Added "Before using this product, carefully read and follow all label precautions and directions."; (2) revised second, third, fourth, fifth and sixth paragraphs for consistency with the label for Telone C-35 and Telone EC; (3) added "The certified applicator supervising. . . program was completed." to comply with chloropicrin RED.
11. General Use Precautions: (1) Added "Not for use in greenhouses or other enclosed areas." for consistency with the label for Telone EC; (2) added "Do not use containers. . . to such metals." for consistency with the label for Telone EC.
12. Fumigation Handlers: Added section to comply with chloropicrin RED.
13. Recontamination Prevention: Revised section for consistency with the label for Telone C-35.
14. Fertility Interactions: Revised section for consistency with the label for Telone C-35.
15. Use Restrictions for Certain Florida Counties: Revised section for consistency with the label for Telone C-35.
16. Protection for Handlers: Added section to comply with chloropicrin RED.
17. Application Requirements: Added section to comply with chloropicrin RED.
18. Mandatory Good Agricultural Practices: Added section to comply with chloropicrin RED.
19. Site Specific FMP: Added section to comply with chloropicrin RED.

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20. Entry Restricted Period and Notification Requirements: Added section to comply with chloropicrin RED.
21. Planting Interval: Revised section for consistency with the label for Telone EC.
22. Frequency/Timing of Application: Added section for consistency with the label for Telone EC.
23. Compatible Materials: Revised section for consistency with the label for Telone EC.
24. Drip Application: Revised section for consistency with the label for Telone EC.
25. Drip Irrigation Design: Revised section for consistency with the label for Telone EC.
26. Drip Fumigation Procedures: Revised section for consistency with the label for Telone EC.
27. Use Precautions for Drip Irrigation: (1) Deleted "Special Chemigation Application Equipment" from heading; (2) in fourth bullet point, added "(including greenhouse systems)" per PR Notice 87-1.
28. Control of Nematodes: (1) In first paragraph added "management of soil diseases" for consistency with the label for Telone C-35; (2) in fifth footnote underneath table, changed "recommended" to "specified."

**19Oct09 – Additional proposed changes by amendment based on comments from Andrea Carone (EPA) to Dave Barnekow (DAS):**

1. First Aid: Moved section underneath heading Precautionary Statements.
2. Personal Protective Equipment: In #1, (1) added "must wear at a minimum" to title; (2) deleted "The following PPE must be immediately available to the handler in case of emergency:"; (3) added "must be immediately available to the handler in case of emergency" after "Coveralls"; (4) added "See Directions for Use. . .respirator is required."
3. Personal Protective Equipment: In #2, added "See Directions for Use. . .respirator is required."
4. Personal Protective Equipment: In #3, added "See Directions for Use. . .stop work requirements."
5. Personal Protective Equipment: In #4, (1) added "See Directions for Use. . .respirator is required."; (2) in next paragraph, added "For all handlers in numbers 1 through 4" after "Important."
6. Personal Protective Equipment: In #5, revised last sentence in last bullet point to read "See further respirator requirements in the User Safety Requirements and Directions for Use sections on this label."
7. Protection for Handlers: (1) Added "1. Handlers Performing Mechanical Transfer of Product – Closed Delivery Systems" and text previously included in Personal Protective Equipment #1; (2) added "2. When Handling Liquid, All Handlers (Including Applicators)" and text previously included in Personal Protective Equipment #2; (3) added "3. Handlers in Treated Area Within 5 Days After Application" and text previously included in Personal Protective Equipment #3; (4) added "4. Handlers in the Treated Area 5 Days After Application Until the Entry Restricted Period Ends" and text previously included in Personal Protective Equipment #4.
8. Bulk and Non-Bulk Containers: Changed heading from Engineering Controls and moved section to Chloropicrin Drip Applications.
9. Environmental Hazards: (1) Revised first paragraph; (2) in second paragraph, deleted "For untarped applications. . .after soil fumigation."
10. Agricultural Use Requirements: (1) Revise fourth sentence to read "It also contains. . .notification to workers."; (2) added "No instructions elsewhere. . .requirements of WPS."
11. General Use Precautions: Revised first paragraph to read "Soil fumigation using InLine must be conducted only according to directions and conditions for use described on this label."
12. General Information: (1) Added new second paragraph "Do not wear jewelry. . .and cause skin injury."; (2) revised sixth paragraph to read "Apply InLine as a. . .applications of this product."; (3) deleted "The certified applicator. . .program was completed."
13. General Use Precautions: Deleted "Soil must be in good seedbed condition, free of clods and undecomposed plant material."
14. Fumigation Handlers: (1) In first paragraph, added sentence "(Note: Persons installing, perforating, removing, repairing, and monitoring tarps are considered handlers for the durations listed below.);"; (2) revised sixth bullet point to read "Installing, repairing, operating, or removing irrigation equipment in the fumigant application block."; (3) in last paragraph of eighth bullet point, changed "(see Tarp Perforation and Removal section)" to "(Note: See Tarp Perforation and Removal section on this labeling for requirements about when tarps are allowed to be perforated.);"; (4) revised ninth bullet point to read "Performing any handling tasks as defined by the WPS."
15. Recontamination Prevention: Deleted "Do not use containers. . .to such metals."



16. Supervision of Handlers: (1) In last sentence of first paragraph, spelled out Fumigation Management Plan; (2) in third paragraph, changed "Note" to "Important"; (3) revised fourth paragraph to read "The certified applicator must provide the Fumigant Safe Handling information to each handler involved in the application or confirm that each handler participating in the application has received fumigant safe handling information within the past 12 months."; (4) in fifth paragraph, deleted "fumigant."
17. Air Purifying Respirator Availability: (1) Added "These handlers must be fit-tested, trained, and medically examined."; (2) revised third sentence to read "This must be documented in the FMP."; (3) added "Cartridges or canisters must. . .whichever occurs first."
18. Air-Rescue Device Availability: Added heading.
19. Respirator Fit Testing, Medical Qualification and Training: (1) Revised first sentence to read "Employers must verify that any handler who uses a respirator is."; (2) in third bullet point, added "Upon request by local/state/federal/tribal enforcement personnel, employees must provide documentation demonstrating how they have complied with these requirements."
20. Tarp Perforation and/or Removal: (1) In first paragraph, changed "Note" to "Important"; (2) in second paragraph, deleted "after injection of the fumigant product and tarps have been laid or" and "or removal"; (3) in second paragraph, revised last sentence to read "See Early Tarp Perforation for Flood Prevention Activities section. For optimum control, the tarp should remain in place for a minimum of 14 days."; (4) in third paragraph, deleted "Each tarp panel used for broadcast fumigation must be perforated."; (5) in fifth paragraph, deleted "Tarp perforation for. . .within 12 hours."
21. Early Tarp Removal for Broadcast Applications Only: Deleted section.
22. Mandatory Good Agricultural Practices: (1) In first paragraph, deleted "report" from end of second sentence; (2) revised first bullet point of third paragraph to read "The certified applicator supervising the application has verified that those elements are current and applicable to the application block before it is fumigated."; (3) in fourth paragraph, added "a copy of" to first sentence; (4) in fourth paragraph, added "local" to second sentence; (5) in fourth paragraph, added "immediately" to last sentence.
23. Tarps: In first paragraph, deleted "When tarps are used in chloropicrin applications" from first sentence.
24. Weather Conditions: (1) Revised third paragraph to combine the sentences into one sentence; (2) added fourth paragraph.
25. Soil Preparation: In last sentence of second paragraph, changed "is" to "would be."
26. InLine Drip Applications – (1) Additional GAPS: Revised heading from "Chloropicrin Drip Applications"; (2) in first paragraph, changed "chloropicrin" to "InLine"; (3) added section for Soil Temperature.
27. Product and Dosage: (1) In first sentence, changed "fumigant" to "InLine"; (2) deleted "Fumigant must be. . .assure proper agitation."; (3) added "Apply appropriate rate. . .with soil to absorb."
28. System Controls and Integrity: (1) In second paragraph, changed "fumigant" to "InLine"; (2) in second paragraph, deleted "Do not use. . .to such metals." (3) added "The following materials. . .be used with InLine." (4) added "vacuum relief valve" to first bullet point; (5) added "The valve must be compatible with the fumigant." to the third bullet point; (6) added three bullet points.
29. System Flush: (1) In first, second, and third sentences, changed "fumigant" to "InLine"; (2) added three sentences.
30. Soil Sealing: Revised first sentence to read "Tarps must be put in place before the fumigation begins."
31. Application Depth: Deleted section.
32. Tarp Information and Procedures for Repair, Perforation and Removal: (1) Deleted "(if tarp is used)" from heading; (2) revised eighth bullet point to read "Name and phone number of person responsible for perforating and/or removing tarps."; (3) revised ninth bullet point to read "Equipment/methods used to perforate tarps"; (4) revised tenth bullet point to read "Schedule and target dates for perforating tarps."
33. Authorized On Site Personnel: (1) Revised first bullet point to read "Names, addresses and phone numbers of handlers"; (2) revised second bullet point to read "Names, addresses and phone numbers for employers of handlers.
34. Air Monitoring Plan: Revised second bullet point to read "If the intention is to cease operations when sensory irritation is experienced, provide the name, address and phone number of the handler that will perform monitoring activities prior to operations resuming."

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35. Recordkeeping Procedures: Deleted "and the post-application summary."
36. Weather Conditions: Added "weather" to both bullet points.
37. Tarp Perforation/Removal Details: Deleted "(if Applicable)" from heading.
38. Entry Restricted Period: (1) Added "Note: Persons installing, repairing or monitoring tarps are handlers until 14 days after the application is complete if tarps are not perforated and removed during those 14 days."; (2) in second paragraph, changed "for requirements" to "on this labeling."
39. Notification Requirements: (1) Added "fumigant treated area" to second sentence; (2) in sixth bullet point, changed "Name of the product" to "InLine."
40. Planting Interval: Moved to InLine Drip Applications – Additional GAPs.
41. Frequency/Timing of Application: Deleted section.
42. Preharvest Interval: Moved to InLine Drip Applications – Additional GAPs.
43. Drip Application: Deleted section.
44. Drip Irrigation Design: Moved to InLine Drip Applications – Additional GAPs.
45. Pre-Irrigation: Changed from "Step 1, Pre-Irrigation: and moved to InLine Drip Applications – Additional GAPs.
46. Step 2, Drip Fumigant Application: Deleted section.
47. Step 3, Post Application: Deleted section.
48. Use Precautions for Drip Irrigation: (1) Moved to InLine Drip Applications – Additional GAPs; (2) revised fifth bullet point to read "The certified applicator or WPS trained handlers under the supervision of and in communication with the certified applicator shall shut the system down and make necessary adjustments should the need arise."; (3) deleted remaining bullet points.
49. Table 1: Revised first footnote to read "Rates given are the maximum broadcast equivalent rate."

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(Base label):

**RESTRICTED USE PESTICIDE**

Due to acute toxicity and carcinogenicity.

For retail sale to and use by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

**InLine<sup>®</sup>****Soil Fungicide and Nematicide****A multi-purpose liquid fumigant for preplant treatment of soil to control plant parasitic nematodes, symphyllans and to help manage certain soil borne diseases in cropland using drip irrigation systems only.**

## Active Ingredients:

1,3-dichloropropene .....	60.8%
chloropicrin .....	33.3%
Other Ingredients .....	5.9%
Total .....	100.0%

One gallon of InLine weighs about 11.2 lb and contains 6.81 lb of 1,3-dichloropropene and 3.73 lb of chloropicrin.

**Keep Out of Reach of Children****DANGER**  **POISON**

[Editors note: the word POISON must appear in red]

**PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**Precautionary Statements****Hazards to Humans and Domestic Animals****First Aid****If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 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 15-20 minutes. Remove contact lenses, if present, after the first 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.

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**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.

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.

### Hazardous Liquid and Vapor

- **Do not get in eyes. Corrosive to eyes and causes irreversible eye damage.**
- **Do not get on skin or clothing. Corrosive to skin and causes skin burns. Fatal if absorbed through the skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.**
- **Do not take internally. Fatal if swallowed or inhaled.**
- **Do not breathe vapor. Prolonged contact may cause lung, liver, and kidney damage and respiratory system irritation.**
- **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 product also contains chloropicrin, a strong lachrymator (tear-producing eye irritant), which has the capacity to cause marked irritation to the upper respiratory tract. 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.**

### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. For more options, follow the instructions for Category H on the 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 mechanical transfer of product - closed delivery systems – must wear at a minimum:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Protective eyewear (**do not** wear goggles)
- Coveralls must be immediately available to the handler in case of emergency
- If sensory irritation (tearing, burning of the eyes or nose) is experienced, handlers must wear at a minimum either:
  - a full-face respirator with an organic vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C) **or**
  - a full-face respirator with a canister approved for pesticides (NIOSH approval number prefix TC-14G).

See Directions for Use, Respiratory Protection and Stop Work Triggers, number 1, Handlers Performing Mechanical Transfer of Product – Closed Delivery Systems for when a full-face respirator is required.

**2. When handling liquid, all handlers (including applicators) must wear at a 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
- Protective eyewear (**do not** wear goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C) or canister approved for pesticides (NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.
- If sensory irritation (tearing, burning of the eyes or nose) is experienced, handlers must wear at a minimum either:
  - a full-face respirator with an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C), **or**
  - a full-face respirator with a canister approved for pesticides (NIOSH approval number prefix TC-14G).

See Directions for Use, Respiratory Protection and Stop Work Triggers, number 2, When Handling Liquid, All Handlers (Including Applicators) for when a full-face respirator is required.

**3. Handlers in treated area within 5 days after application must wear at a minimum:**

- Coveralls
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C) or canister approved for pesticides (NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

See Directions for Use, Respiratory Protection and Stop Work Triggers number 3, Handlers in Treated Area Within 5 Days After Application for respirator monitoring and stop work requirements.

**4. Handlers in the treated area 5 days after application until the entry restricted period ends must wear:**

- Long-sleeved shirt and long pants
- Shoes and socks
- If sensory irritation (tearing, burning of the eyes or nose) is experienced, handlers must wear at a minimum either:
  - a full-face respirator with an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C), **or**
  - a full-face respirator with a canister approved for pesticides (NIOSH approval number prefix TC-14G).

See Directions for Use, Respiratory Protection and Stop Work Triggers, number 4, Handlers in the Treated Area 5 Days after Application Until the Entry Restricted Period Ends for when a full-face respirator is required.

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**Important:** For all handlers in numbers 1 through 4, an air-supplying respirator [i.e., a respirator connected directly to a clean air source or a self-contained breathing apparatus (SCBA)] is not permitted for routine handler tasks. Such respirators are only permitted in emergencies such as a spill or leak or when corrective action is needed to reduce air levels to acceptable levels.

**5. 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 a 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 NIOSH approval number prefix TC-19C or self-contained breathing apparatus (SCBA) with NIOSH approval number prefix TC-13F. See further respirator requirements in the User Safety Requirements and Directions for Use sections 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.

### User Safety Requirements

1. **Never fumigate alone:** It is imperative to always have an assistant and proper protective equipment in case of accidents.
2. **Dispose of Contaminated Clothing:** Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.
3. **Clean and Maintain PPE:** Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.
4. **Contact with Mouth:** Never siphon this product by mouth or use mouth to blow out clogged lines, nozzles, etc.
5. **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.

### Environmental Hazards

This pesticide is toxic to mammals and birds. 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 washwaters or rinsate.

Chloropicrin has certain properties and characteristics in common with chemicals that have been detected in groundwater (chloropicrin is highly soluble in water and has low adsorption to soil).

**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.

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## Physical or Chemical Hazards

**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 label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

#### (Storage and Disposal for refillable rigid containers larger than 5 gal)

##### Storage and Disposal

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

**Pesticide Storage:** Store in tightly closed original container in a cool place away from dwellings. Do not allow contamination of seeds, plants, fertilizers, or other pesticide chemicals.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

Because InLine 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 InLine into surface or underground water supplies.

**Container Handling:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

#### (Storage and Disposal for nonrefillable rigid containers larger than 5 gal)

##### Storage and Disposal

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

**Pesticide Storage:** Store in tightly closed original container in a cool place away from dwellings. Do not allow contamination of seeds, plants, fertilizers, or other pesticide chemicals.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

Because InLine 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 InLine into surface or underground water supplies.

**Container Handling:** Nonrefillable container. Do not reuse or refill this container.

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

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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. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

**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.

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

EPA Reg. No. 62719-348

EPA Est. \_\_\_\_\_

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**Produced for  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268**

**Net Contents** \_\_\_\_\_



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(Label booklet cover):

**RESTRICTED USE PESTICIDE**

Due to acute toxicity and carcinogenicity.

For retail sale to and use by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

**InLine®**

**Soil Fungicide and Nematicide**

**A multi-purpose liquid fumigant for preplant treatment of soil to control plant parasitic nematodes, symphylans and to help manage certain soil borne diseases in cropland using drip irrigation systems only.**

Active Ingredients:

1,3-dichloropropene .....	60.8%
chloropicrin .....	33.3%
Other Ingredients .....	5.9%
Total .....	100.0%

One gallon of InLine weighs about 11.2 lb and contains 6.81 lb of 1,3-dichloropropene and 3.73 lb of chloropicrin.

**Keep Out of Reach of Children**

**DANGER**  **POISON**

[Editors note: the word POISON must appear in red]

**PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**Agricultural Use Requirements**

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

**Refer to inside of label booklet for additional precautionary information including 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.

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

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(page 1 to end)

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## Precautionary Statements

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### Hazards to Humans and Domestic Animals

# DANGER

#### Hazardous Liquid and Vapor

- Do not get in eyes. Corrosive to eyes and causes irreversible eye damage.
- Do not get on skin or clothing. Corrosive to skin and causes skin burns. Fatal if absorbed through the skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.
- Do not take internally. Fatal if swallowed or inhaled.
- Do not breathe vapor. Prolonged contact may cause lung, liver, and kidney damage and respiratory system irritation.
- 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 product also contains chloropicrin, a strong lachrymator (tear-producing eye irritant), which has the capacity to cause marked irritation to the upper respiratory tract. 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.

#### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. For more options, follow the instructions for Category H on the 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 mechanical transfer of product - closed delivery systems – must wear at a minimum:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Protective eyewear (do not wear goggles)
- Coveralls must be immediately available to the handler in case of emergency
- If sensory irritation (tearing, burning of the eyes or nose) is experienced, handlers must wear at a minimum either:
  - a full-face respirator with an organic vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C) or
  - a full-face respirator with a canister approved for pesticides (NIOSH approval number prefix TC-14G).

See Directions for Use, Respiratory Protection and Stop Work Triggers, number 1, Handlers Performing Mechanical Transfer of Product – Closed Delivery Systems for when a full-face respirator is required.

**2. When handling liquid, all handlers (including applicators) must wear at a 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
- Protective eyewear (**do not** wear goggles)
- A half-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C) or canister approved for pesticides (NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.
- If sensory irritation (tearing, burning of the eyes or nose) is experienced, handlers must wear at a minimum either:
  - a full-face respirator with an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C), **or**
  - a full-face respirator with a canister approved for pesticides (NIOSH approval number prefix TC-14G).

See Directions for Use, Respiratory Protection and Stop Work Triggers, number 2, When Handling Liquid, All Handlers (Including Applicators) for when a full-face respirator is required.

**3. Handlers in treated area within 5 days after application must wear at a minimum:**

- Coveralls
- Chemical-resistant gloves, such as barrier laminate (EVAL) or viton
- Chemical-resistant footwear plus socks
- Full-face respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C) or canister approved for pesticides (NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

See Directions for Use, Respiratory Protection and Stop Work Triggers number 3, Handlers in Treated Area Within 5 Days After Application for respirator monitoring and stop work requirements.

**4. Handlers in the treated area 5 days after application until the entry restricted period ends must wear:**

- Long-sleeved shirt and long pants
- Shoes and socks
- If sensory irritation (tearing, burning of the eyes or nose) is experienced, handlers must wear at a minimum either:
  - a full-face respirator with an organic-vapor-removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C), **or**
  - a full-face respirator with a canister approved for pesticides (NIOSH approval number prefix TC-14G).

See Directions for Use, Respiratory Protection and Stop Work Triggers, number 4, Handlers in the Treated Area 5 Days after Application Until the Entry Restricted Period Ends for when a full-face respirator is required.

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**Important:** For all handlers in numbers 1 through 4, an air-supplying respirator [i.e., a respirator connected directly to a clean air source or a self-contained breathing apparatus (SCBA)] is not permitted for routine handler tasks. Such respirators are only permitted in emergencies such as a spill or leak or when corrective action is needed to reduce air levels to acceptable levels.

**5. 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 a 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 NIOSH approval number prefix TC-19C or self-contained breathing apparatus (SCBA) with NIOSH approval number prefix TC-13F. See further respirator requirements in the Protection of Handlers 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.

### User Safety Requirements

1. **Never fumigate alone:** It is imperative to always have an assistant and proper protective equipment in case of accidents.
2. **Dispose of Contaminated Clothing:** Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.
3. **Clean and Maintain PPE:** Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.
4. **Contact with Mouth:** Never siphon this product by mouth or use mouth to blow out clogged lines, nozzles, etc.
5. **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, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 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 15-20 minutes. Remove contact lenses, if present, after the first 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.

**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.

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.

### Environmental Hazards

This pesticide is toxic to mammals and birds. 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 washwaters or rinsate.

Chloropicrin has certain properties and characteristics in common with chemicals that have been detected in groundwater (chloropicrin is highly soluble in water and has low adsorption to soil).

**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.

### Physical or Chemical Hazards

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

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### Directions for Use

#### Restricted Use Pesticide

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

### Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements in this labeling about personal protective equipment (PPE), restricted-entry intervals, and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS). No instructions elsewhere on the labeling relieve users from complying with the requirements of WPS. For the entry restricted period and notification requirements, see the Entry Restricted Period and Notification section of this label.

### Storage and Disposal

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

**Pesticide Storage:** Store in tightly closed original container in a cool place away from dwellings. Do not allow contamination of seeds, plants, fertilizers, or other pesticide chemicals.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

Because InLine 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 InLine into surface or underground water supplies.

**Refillable containers 5 gallons or larger:**

**Container Handling:** Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

**Nonrefillable containers 5 gallons or larger:**

**Container Handling:** Nonrefillable container. Do not reuse or refill this container.

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. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

## General Information

Before using this product, carefully read and follow all label precautions and directions.

Do not wear jewelry, rubber gloves, goggles, tight clothing, rubber protective clothing, or rubber boots when handling. Chloropicrin is heavier than air and can be trapped inside clothing and cause skin injury.

InLine is a multi-purpose liquid fumigant for preplant treatment of cropland soil that can be used as part of a nematode and disease management program involving crop rotation, planting resistant varieties, and other cultural practices designed to reduce nematode and disease pressure.

InLine may be applied as a preplant soil treatment as part of a management program to aid in reducing the damaging effects of certain soil borne diseases [soil rot (soil pox) of sweet potatoes; granville (bacterial) wilt, black root rot, black shank diseases of tobacco; verticillium wilt of strawberries, cole crops and mint, pink root of onions, pod rot of peanuts, fusarium crown and root rot of tomatoes]. This is not a complete list of crops and soil borne diseases. Consult your crop advisor for recommendations on specific soil borne diseases.

InLine may be applied as a preplant soil treatment as part of a management program to control and aid in reducing the damaging effects of certain soil pests; plant parasitic nematodes (root-knot, root lesion, citrus, cyst formers, golden, sugarbeet, soybean, burrowing, lance, reniform, ring, spiral, sting, pin, stubby root, dagger and certain others); symphylans (garden centipedes) and wireworms.

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Apply InLine as a preplant application through surface and/or buried drip (drip lines buried at least 5 inches below soil surface) irrigation equipment with a tarped seal. Use of a tarp seal is mandatory for all applications of this product.

Before fumigation, soil sampling for the type and number of pests present is recommended. In fields where pre-treatment soil samples indicate the presence of high population levels of nematodes, a successful fumigation cannot be expected to eradicate entire populations. Therefore, post-treatment (mid-season and/or preharvest) sampling is recommended to determine the need for additional pest management practices.

Consult State Agricultural Experiment Station or Extension Service specialists for information on other practices such as post-harvest destruction of crop residues, weed control or other cultural practices, and use of nematode resistant crop varieties that may aid in reducing crop losses from soil borne pests.

### **General Use Precautions**

Soil fumigation using InLine must be conducted only according to directions and conditions for use described on this label.

**Not for use in greenhouses or other enclosed areas.**

**Do not formulate and/or tank mix this product into other end-use agricultural products.**

### **Fumigation Handlers**

The following activities are prohibited from being performed in the application block (i.e., the field or portion of a field treated with a fumigant in any 24-hour period) by anyone other than persons who have been appropriately trained and equipped as handlers in accordance with the requirements in the Worker Protection Standard (40 CFR Part 170), from the start of the application until the entry restricted period ends. (**Note:** Persons installing, perforating, removing, repairing, and monitoring tarps are considered handlers for the durations listed below.) Those activities include those persons:

- Participating in the application as supervisors, loaders, drivers, tractor co-pilots, shovelers, cross ditchers, or as other direct application participants (the application starts when the fumigant is first introduced into the soil and ends after the fumigant has stopped being delivered/dispensed to the soil).
- Using devices to take air samples to monitor fumigant air concentrations.
- Cleaning up fumigant spills (this does not include emergency personnel not associated with the fumigation application).
- Handling or disposing of fumigant containers.
- Cleaning, handling, adjusting, or repairing the parts of fumigation equipment that may contain fumigant residues.
- Installing, repairing, operating or removing irrigation equipment in the fumigant application block.
- Entering the application site to perform scouting, crop advising, or monitoring tasks.
- Installing, perforating (cutting, punching, slicing, poking), removing, repairing or monitoring tarps:
  - until 14 days after application is complete if tarps are not perforated and removed during those 14 days or
  - until tarp removal is complete if tarps are both perforated and removed less than 14 days after application or



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- until 48 hours after tarp perforation is complete if they will not be removed within 14 days after application. (**Note:** See Tarp Perforation and Removal section on this labeling for requirements about when tarps are allowed to be perforated.)
- Performing any handling tasks as defined by the WPS.

### Recontamination Prevention

InLine will help manage certain soil borne pests that are present in the soil treatment zone at time of fumigation. It will not control pests that are introduced into soil after fumigation. To avoid reinfestation of treated soil, do not use irrigation water, transplants, seed pieces, or equipment that could carry soil borne pests from infested land. Avoid contamination from moving infested soil onto treated beds through cultivation, movement of soil from below the treated zone, dumping contaminated tare soil in treated fields and soil contamination from equipment or crop remains. Clean equipment carefully before entering treated fields.

### Fertility Interactions

Fumigation may temporarily raise the level of ammonia nitrogen and soluble salts in the soil. This is most likely to occur when high rates of fertilizer and fumigant are applied to soils that are either cold, wet, acidic, or high in organic matter. To avoid injury to certain crops including red beets, carrots, corn, radishes, cole crops, legumes (beans), lettuce, onions, and sugarbeets, fertilize when possible as indicated by soil tests made after fumigation. To avoid ammonia injury or nitrate starvation (or both) to crops grown on high organic soils, do not use fertilizers containing ammonium salts. Use only fertilizers containing nitrates until after the crop is well established and the soil temperature is above 65°F.

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.

### Use Restrictions for Certain Florida Counties

For application of this product in Brevard, Charlotte, Citrus, Collier, DeSoto, Glades, Hardee, Hendry, Hernando, Highlands, Hillsborough, Indian River, Lake, Lee, Manatee, Martin, Monroe, Okeechobee, Orange, Osceola, Palm Beach, Pasco, Pinellas, Polk, Sarasota, Seminole, St. Lucie, Sumter, and Volusia counties, applicators must have labeling for FIFRA Section 24(c) Special Local Need (SLN) FL-010009 in their possession and comply with stated requirements. Use of InLine is prohibited in Broward and Dade counties.

### Protection for Handlers

#### 1. Handlers Performing Mechanical Transfer of Product - Closed Delivery Systems

The following procedures must be followed to determine whether a full-face air-purifying respirator is required or if operations must cease:

- If at any time any handler experiences sensory irritation (tearing, burning of the eyes or nose) then either:
  - a full-face air-purifying respirator must be worn by all handlers or
  - operations must cease.
- Handlers can remove full-face air-purifying respirators or resume operations if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show that levels of chloropicrin have decreased to less than 0.15 ppm provided that handlers do not experience

sensory irritation. During the collection of air samples, a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.

- When using monitoring devices to monitor air concentration levels, a direct reading detection device, such as a Matheson-Kitagawa, Dräger, or Sensidyne device, must be used. The devices must have a sensitivity of at least 0.15 ppm for chloropicrin.
- When breathing zone samples are required, they must be taken outside of the respiratory protection equipment and within a 10-inch radius of the handler's nose and mouth.
- When full-face air-purifying respirators are worn, then air monitoring samples must be collected at least every two hours in the breathing zone of a handler performing a representative handling risk.
- If at any time: (1) a handler experiences any sensory irritation when wearing a full-face air-purifying respirator, or (2) an air sample is greater than or equal to 1.5 ppm, then all handler activities must cease and handlers must be removed from the application block. If operations cease, the emergency plan detailed in the FMP must be implemented.
- Handlers can resume work activities without full-face air-purifying respirators if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show levels of chloropicrin have decreased to less than 0.15 ppm, provided that handlers do not experience sensory irritation. During the collection of air samples a full-face air purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.
- Work activities can resume if the following conditions exist provided that a full-face air-purifying respirator is worn:
  - Two consecutive breathing zone samples for chloropicrin taken at the handling site at least 15 minutes apart must be less than 1.5 ppm but are greater than 0.15 ppm,
  - Handlers do not experience sensory irritation while wearing the air-purifying respirator, and
  - Cartridges have been changed.
- During the collection of air samples, a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.

## 2. When Handling Liquid, All Handlers (Including Applicators)

The following procedures must be followed to determine whether a full-face air-purifying respirator is required or if operations must cease:

- If at any time any handler experiences sensory irritation (tearing, burning of the eyes or nose) while wearing a half-face respirator then either:
  - a full-face air-purifying respirator must be worn by all handlers who remain in the application block **or**
  - operations must cease and handlers not wearing full-face air-purifying respirators must leave the application block.
- When full-face air-purifying respirators are worn, then air monitoring samples for chloropicrin must be collected at least every two hours in the breathing zone of a handler performing a representative handling task.
- When using monitoring devices to monitor air concentration levels, a direct reading detection device, such as a Matheson-Kitagawa, Dräger, or Sensidyne device, must be used. The devices must have a sensitivity of at least 0.15 ppm for chloropicrin.

- When breathing zone samples are required, they must be taken outside of the respiratory protection equipment and within a 10-inch radius of the handler's nose and mouth.
- If at any time: (1) a handler experiences any sensory irritation when wearing a full-face air-purifying respirator, or (2) an air sample is greater than or equal to 1.5 ppm, then all handler activities must cease and handlers must be removed from the application block. If operations cease, the emergency plan detailed in the FMP must be implemented.
- Handlers can remove full-face air-purifying respirators or resume work activities if the following conditions exist provided that a half-face air-purifying respirator is worn:
  - Two consecutive breathing zone samples for chloropicrin taken at the handling site at least 15 minutes apart must be less than 1.5 ppm.
  - Handlers do not experience sensory irritation and
  - Air-purifying respirator cartridges have been changed.
- During the collection of air samples, a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.

### 3. Handlers in Treated Area Within 5 Days After Application

- When full-face air-purifying respirators are worn, then air monitoring samples for chloropicrin must be collected at least every two hours in the breathing zone of a handler performing a representative handling task.
- When using monitoring devices to monitor air concentration levels, a direct reading detection device, such as a Matheson-Kitagawa, Dräger, or Sensidyne device, must be used. The devices must have a sensitivity of at least 0.15 ppm for chloropicrin.
- When breathing zone samples are required, they must be taken outside of the respiratory protection equipment and within a 10-inch radius of the handler's nose and mouth.
- If at any time: (1) a handler experiences any sensory irritation when wearing a full-face air-purifying respirator, or (2) an air sample is greater than or equal to 1.5 ppm, then all handler activities must cease and handlers must be removed from the application block. If operations cease, the emergency plan detailed in the FMP must be implemented.
- Work activities can resume if the following conditions exist provided that a full-face air-purifying respirator is worn:
  - Two consecutive breathing zone samples for chloropicrin taken at the handling site at least 15 minutes apart must be less than 1.5 ppm.
  - Handlers do not experience sensory irritation and
  - Air-purifying respirator cartridges have been changed.
- During the collection of air samples, a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.

### 4. Handlers in the Treated Area 5 Days After Application Until the Entry Restricted Period Ends

The following procedures must be followed to determine whether a full-face air-purifying respirator is required or if operations must cease:

- If at any time any handler experiences sensory irritation (tearing, burning of the eyes or nose) then either:
  - a full-face air-purifying respirator must be worn by all handlers who remain in the application block or
  - operations must cease and handlers not wearing respiratory protection must leave the application block.

- Handlers can remove full-face air-purifying respirators or resume operations if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show that levels of chloropicrin have decreased to less than 0.15 ppm provided that handlers do not experience sensory irritation. During the collection of air samples a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.
- When using monitoring devices to monitor air concentration levels, a direct reading detection device, such as a Matheson-Kitagawa, Dräger, or Sensidyne device, must be used. The devices must have a sensitivity of at least 0.15 ppm for chloropicrin.
- When breathing zone samples are required, they must be taken outside of the respiratory protection equipment and within a 10-inch radius of the handler's nose and mouth.
- When full-face air-purifying respirators are worn, then air monitoring samples must be collected at least every two hours in the breathing zone of a handler performing a representative handling risk.
- If at any time: (1) a handler experiences any sensory irritation when wearing a full-face air-purifying respirator, or (2) an air sample is greater than or equal to 1.5 ppm, then all handler activities must cease and handlers must be removed from the application block. If operations cease, the emergency plan detailed in the FMP must be implemented.
- Handlers can resume work activities without full-face air-purifying respirators if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show levels of chloropicrin have decreased to less than 0.15 ppm, provided that handlers do not experience sensory irritation. During the collection of air samples a full-face air purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.
- Work activities can resume if the following conditions exist provided that a full-face air-purifying respirator is worn:
  - Two consecutive breathing zone samples for chloropicrin taken at the handling site at least 15 minutes apart must be less than 1.5 ppm but are greater than 0.15 ppm,
  - Handlers do not experience sensory irritation while wearing the air-purifying respirator, and
  - Cartridges have been changed.
- During the collection of air samples, a full-face air-purifying respirator must be worn by the handler taking the air samples. Samples must be taken where the sensory irritation is first experienced.

### **Supervision of Handlers**

For water run applications (e.g., drip), the certified applicator must be at the fumigation site to start the application including set up, calibration, and initiation of the application. The certified applicator may leave the site but must return at least every two hours to visually inspect the equipment to ensure proper functioning and must directly supervise all WPS trained handlers on site until the fumigation has stopped being delivered/dispersed into the soil. WPS trained handlers may perform the monitoring functions in place of the certified applicator, but must be under the supervision of the certified applicator and be able to communicate with the certified applicator at all times during monitoring activities via cell phone or other means. The results of monitoring activities must be captured in the Fumigant Management Plan's (FMP) post-application summary.

For handling activities that take place after the fumigant has been delivered/dispensed into the soil until the entry restricted period expires, the certified applicator does not have to be on site but must have communicated in a manner that can be understood to the site owner/operator and handlers responsible for carrying out those activities the information necessary to comply with the label and procedures

described in the FMP (e.g., emergency response plans and procedures). Communication activities must be captured in the FMP.

**Important:** This requirement does not override the requirements in the Worker Protection Standard for Agricultural Pesticides for information exchange between owners/operators of agricultural establishments and commercial pesticide applicators.

The certified applicator must provide the Fumigant Safe Handling information to each handler involved in the application or confirm that each handler participating in the application has received fumigant safe handling information in the past 12 months.

For all handling tasks, at least two handlers trained under the provisions of the WPS 40 CFR 170.230 must be present.

#### **Exclusion of Non-Handlers From Application Block**

The certified applicator supervising the application and the owner/operator of the establishment where the fumigation is taking place must make sure that all persons who are not trained and PPE equipped and who are not performing one of the handling tasks as stated in this label are excluded from the application block during the entry restricted period.

#### **Providing, Cleaning, and Maintaining PPE**

The employer of any handler (as stated in this label) must make sure that all handlers are provided and correctly wear the required PPE. The PPE must be cleaned and maintained as required by the Worker Protection Standard for Agricultural Pesticides.

#### **Air-Purifying Respirator Availability**

The employer of any handler must confirm that an air-purifying respirator and appropriate cartridges of the type specified in the PPE section of this label are immediately available for each handler who will wear one. These handlers must be fit-tested, trained, and medically examined. This must be documented in the FMP. Cartridges or canisters must be replaced when odor or irritation from this product becomes apparent, if the measured concentration of chloropicrin is greater than 1.5 ppm, or after 8 hours of use, whichever occurs first.

#### **Air-Rescue Device Availability**

The employer of any handler must confirm that at least one air-rescue device (e.g., SCBA) is on site and is ready for use in case of an emergency. This must be documented in the FMP.

#### **Respirator Fit Testing, Medical Qualification and Training**

Employers must verify that any handler who uses a respirator is:

- Fit tested and fit checked using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134).
- Trained using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134).
- Examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations, such as a physical exam, might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be reexamined by a qualified medical practitioner if their health status, respirator style or use conditions change. Upon request by local/state/federal/tribal enforcement personnel, employees must provide documentation demonstrating how they have complied with these requirements.

## Application Requirements

### Tarp Perforation and/or Removal

**Important:** Persons perforating, repairing, removing, and/or monitoring tarps are defined, within certain time limitations, as handlers (see handlers as stated in this labeling) and must be provided the PPE and other protections for handlers as required on the labeling and in the Worker Protection Standard for Agricultural Pesticides.

Tarps must not be perforated until a minimum of five days (120 hours) have elapsed after the fumigant injection into the soil is complete (e.g., after drip lines have been purged and tarps have been laid) unless a weather condition exists which necessitates the need for early tarp perforation. See Early Tarp Perforation for Flood Prevention Activities section. For optimum control, the tarp should remain in place for a minimum of 14 days.

If tarps will be removed before planting, tarp removal must not begin until at least two hours after tarp perforation is complete. If tarps will not be removed before planting, planting or transplanting must not begin until at least 48 hours after the tarp perforation is complete. If tarps are left intact for a minimum of 14 days after fumigant injection into the soil is complete, planting or transplanting may take place while the tarps are being perforated.

Tarps used for fumigations may be perforated manually **only** for the following situations:

- At the beginning of each row when a coulter blade (or other device which performs similarly) is used on a motorized vehicle such as an ATV.
- In fields that are 1 acre or less.
- During flood prevention activities.

In all other instances, tarps must be perforated (cut, punched, poked, or sliced) only by mechanical methods.

### Early Tarp Perforation for Flood Prevention Activities

Early tarp perforation is allowed before the five days (120 hours) have elapsed for flood prevention. Tarps must be immediately retucked and packed after soil removal.

## Mandatory Good Agricultural Practices (GAPs)

The following GAPs must be followed during all fumigant applications. All measurements and other documentation planned to ensure that the mandatory GAPs are achieved must be recorded in the FMP and/or the post-application summary.

### Tarps

A written tarp plan must be developed and included in the FMP. The plan must include:

- Schedule and procedures for checking tarps for damage, tears, and other problems.
- Plans for determining when and how repairs to tarps will be made, and by whom.
- Minimum time following injection that tarp will be repaired.
- Minimum size of tarp damage that will be repaired.
- Other factors used to determine how and when tarp repair will be conducted.
- Schedule, equipment and methods used to perforate tarps.
- Aeration plans and procedures following perforation of tarp, but prior to tarp removal or planting/transplanting.
- Schedule, equipment, and procedures for tarp removal.

### Weather Conditions

Prior to fumigation, the weather forecast for the day of the application and the 48-hour period following the fumigation must be checked to determine if unfavorable weather conditions exist (see Identifying Unfavorable Weather Conditions section) or are predicted and whether fumigation should begin.

Wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach at least 5 mph during the application.

Do not apply if a shallow, compressed (low-level) temperature inversion is forecast to persist for more than 18 consecutive hours for the 48-hour period after the start of application, or if there is an air stagnation advisory issued by the National Weather Service in effect for the area in which the fumigation is planned.

Detailed local forecasts for weather conditions, wind speed, and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov>. For further guidance, contact your local National Weather Service Forecasting Office.

**Identifying Unfavorable Weather Conditions:** Unfavorable weather conditions block upward movement of air, which results in trapping fumigant vapors near the ground. The resulting air mass can move off site in unpredictable directions. These conditions typically exist prior to sunset, continue past sunrise and persist as late as noontime. Unfavorable conditions are common on nights with limited cloud cover and light to no wind, and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud.

#### **Soil Preparation**

Soil must be properly prepared and at the surface generally free of clods that are golf ball size or larger. The area to be fumigated must be tilled to a depth of 5 to 8 inches.

Field trash must be properly managed. Residue from a previous crop must be worked into the soil to allow for decomposition prior to fumigation. Little or no crop residue shall be present on the soil surface. Crop residue that is present must not interfere with the soil seal. Removing the crop residue prior to fumigation is important to limit the natural "chimneys" that occur in the soil when crop residue is present. These "chimneys" allow the soil fumigant to move through the soil quickly and escape into the atmosphere. This may create potentially harmful conditions for workers and bystanders and limit the efficacy of the fumigant. However, crop residue on the field serves to prevent soil erosion from both wind and water and is an important consideration. To accommodate erosion control, fumigant efficacy, and human health protection, clear fields of crop residue as close to the timing of the fumigation as possible to limit the length of time that the soil would be exposed to potentially erosive weather conditions.

#### **InLine Drip Applications – Additional GAPS**

In addition to the GAPS required for all InLine soil fumigation applications, the following GAPS apply for drip applications.

#### **Use Precautions for Drip Irrigation:**

- Apply this product only through surface and buried tape drip irrigation systems. Do not apply this product through any other type of irrigation system.
- Crop injury or lack of effectiveness can result from non-uniform distribution of treated water.
- If you have questions about calibration, contact State Extension Service specialists, equipment manufacturers, or other experts.
- Do not connect irrigation system used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- The certified applicator or WPS trained handlers under the supervision of and in communication with the certified applicator shall shut the system down and make necessary adjustments should the need arise.

**Drip Fumigation Procedures, Pre-Irrigation:**

- To obtain more uniform water movement, insure quality fumigant distribution and to test for leaks, a pre-irrigation prior to the planned drip fumigation application is recommended.
- During pre-irrigation, use sufficient water to increase soil moisture throughout the treatment zone to near or at field capacity. This should occur over a 7- to 10-day period prior to application in order to stimulate nematode hatch and activity.
- Allow the soil moisture to return to below field capacity before making the drip fumigant application.
- The pre-irrigation may enhance coverage in very sandy soils, very dry soils, or in soil with deep buried tape (5 inches in depth or greater).

**Soil Preparation:** Till fields with known plowpans because they can lead to puddling of the fumigant due to inadequate soil drainage.

**Drip Irrigation Design:**

- A drip irrigation specialist should be consulted on the design of a drip system to insure irrigation and fumigant application uniformity.
- A drip irrigation specialist should be consulted in the selection of a proper drip tape based upon the water needs of the crop to be grown with the understanding that the tape will also be used for drip fumigation. Selection of the proper emitter spacing, flow rate, and number of tapes per bed is important in obtaining a quality drip fumigant application.
- Drip emitters should be spaced 12 to 24 inches apart on the drip lines. Emitter spacing in excess of 12 inches could result in untreated fumigant zones which could lead to reinfestation of the targeted pest.
- It is important to note that drip tape installed on top of the soil surface has the potential to kink, twist and snake when water is introduced. This could result in tape damage and a lack of irrigation and fumigation uniformity.
- Drip emitters should be spaced evenly apart and close enough to wet the entire bed.
- Planting should occur within the treated area.

**Soil Temperature:** The minimum soil temperature at the depth of injection is 40°F. The maximum soil temperature at the depth of injection must not exceed 90°F at the beginning of the application. If air temperatures have been above 100°F in any of the three days prior to application, then soil temperature must be measured and recorded in the FMP.

**Product and Dosage:** Plan the application by calculating the amount of InLine required at the appropriate rate for the crop, acreage and target pest. Apply appropriate rate (see Table 1) of InLine in enough water so that the soil moisture throughout the treatment zone, including near the soil surface, is again at or near field capacity. The concentration of InLine must be between 500 and 1500 ppm in the drip irrigation lines. Do not exceed a concentration of 1500 ppm of InLine.

Water flow and chemical flow rates must be known in order to calculate the correct ppm. InLine must be metered into the water supply line and then passed through a mixing device such as a centrifugal pump or static mixer to assure proper agitation. Calibration of the chemical flow and water meters is recommended. A chemical flow totalizer and/or scale are recommended to validate the chemical flow.

Fumigant injections made within 50 feet of the first T and/or under conditions of low velocity water flow (less than 2 feet per second) must pass through a mixing device (such as a centrifugal pump or static mixer, coarse filter or fine strainer) to assure proper agitation. A separate mixing device is not needed if the chemical injection point is at least 50 feet in front of the first T junction point and significant turbulent flow is present to insure mixing. For low velocity (laminar) flow, more distance or a mixing device is needed to insure thorough mixing of the fumigant and water before it reaches the site to be treated. The minimum turbulent flow that is required for adequate mixing and to prevent damage to PVC pipe is 2 feet per second.

Do not allow treatment solution to puddle on the soil surface. If ponding, puddling or run-off occurs, then discontinue application immediately and cover with soil to absorb.



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**System Controls and Integrity:** The irrigation system (main lines, headers, drip tape) must be thoroughly checked for leaks before the start of application. Leak detection requires that the irrigation system be at full operating pressure. The amount of time needed at full operating pressure will vary by irrigation system design. Look for puddling along major pipes (holes in pipes or leaky joints), at the top and ends of rows (leaky connection, open drip tape), and on the bed surface (damaged drip tape, malfunctioning emitters). Any leaks discovered during the pre-application check must be repaired prior to fumigant application.

To inject InLine, use a metering system (such as a positive pressure system, positive displacement injection pump, diaphragm pump, or a Venturi system) effectively designed and constructed of materials that are compatible with the fumigant and capable of being fitted with system interlocking controls.

The following materials are recommended for use with InLine:

- Copper, stainless steel, stainless steel braided hose, steel, brass, Kynar, Kalrez, Chemraz, Santoprene, Hasteloy, Monel, polypropylene, polyethylene, nylon, Teflon, rigid PVC and viton (F/G best).
- Do not expose rigid PVC to undiluted InLine or more than 1500 ppm of InLine in the diluted form.

The following materials must **not** be used with InLine:

- Do not use containers, pumps, drip tube or other transfer or drip equipment made of aluminum, magnesium, zinc (including galvanized), cadmium, tin and alloys, or vinyl as under certain conditions. InLine may be severely corrosive to such materials. Unless referring to plasticized vinyl, vinyl and PVC are the same. PVC is listed above.
- Buna-N, neoprene and fiberglass have the potential to disintegrate and may not be used with InLine.

The system must contain:

- A functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination and backflow.
- A functional, automatic, quick-closing check valve to prevent the flow of fluids back toward the fumigant container.
- A functional, normally closed valve located on the intake side of the injection point and connected to the system interlock to prevent the fumigant from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down. The valve must be compatible with the fumigant.
- Functional interlocking controls to automatically shut off the fumigant injection when the irrigation water flow stops or decreases to the point where fumigant distribution is adversely affected.
- Functional interlocking controls to automatically shut off the pesticide injection pump if used when the water pump motor stops.
- A hydraulic interlock valve operated by irrigation water pressure may be used in lieu of a functional pressure switch and/or an automatic functional interlock.
- InLine should be injected into the center of the irrigation water stream by using a suitable dip tube. This will prevent damage from undiluted fumigant contacting PVC pipe at the point of injection.

**Site of Injection and Irrigation System Layout:** Site of injection must be as close as practical to the area being treated (such as direct injection of fumigant into the header pipe/manifold or into an above-ground delivery pipe attached to the header). If the fumigant is injected into a main line, make sure the irrigation pipe is able to be cleared of all fumigant as the fumigant may pool in low sections of the pipe. Also make sure that valves on lateral lines of the main line are closed if these lateral lines lead to areas not being fumigated at the time of the application.

**System Flush:** After application of the InLine, continue to drip irrigate the area with water to flush the irrigation system. Do not allow InLine to remain in the irrigation system after the application is complete. The total volume of water, including the amount used for flushing the irrigation system, must be adequate

to completely remove InLine from the lines, but should be less than the amount that could oversaturate the beds (bed collapse can occur from oversaturation). If common lines are used for both the fumigant application and water seal (if a water seal is applied), these lines must be adequately flushed before starting the water seal and/or normal irrigation practices. Make sure that any PVC dead ends or low spots are flushed completely. Leave the soil undisturbed for at least 14 days. Then, proceed with normal crop management activities. Do not plant if InLine is detected.

**Bulk and Non-Bulk Containers:** With all bulk and non-bulk containers, InLine must be transferred through connecting hoses, pipes, and/or couplings sufficiently tight to prevent workers or other persons from coming in contact with liquid InLine.

- All hoses, piping, and tanks used in connection with InLine 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 InLine 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 InLine beyond a pump must not exceed the manufacturer's maximum pressure specification.

**Soil Sealing:** Tarps must be put in place before the fumigation begins. Tarp edges must be buried along the furrow and at the ends of rows.

#### **Preharvest Interval**

Not applicable.

**Planting Interval:** Leave the soil undisturbed and unplanted for at least 14 days after applying InLine. A longer undisturbed interval is required under cold or wet soil conditions.

After fumigation, to prevent phytotoxicity, allow the fumigant to dissipate completely before planting the crop. Dissipation is usually complete when InLine can no longer be detected at the application depth. Under optimum soil conditions for dissipation, a period of 1 week for each 10 gallons per treated acre is recommended with a minimum interval of 14 days following application. Seed or transplants to be grown may be used as a bioassay to determine if InLine is present in the soil at concentrations sufficient to cause plant injury. Do not plant if InLine is detected.

#### **Site Specific FMP**

Prior to the start of fumigation, the certified applicator supervising the application must verify that a site specific FMP exists for each application block (i.e., field or portion of a field treated with a fumigant in any 24-hour period). In addition, an agricultural operation fumigating multiple application blocks may format the FMP in a manner whereby all of the information that is common to all of the application blocks is captured once and any information unique to a particular application block or blocks is captured in subsequent sections. The FMP may be prepared by the certified applicator, the site owner/operator, registrant, or other party. The certified applicator must verify in writing (sign and date) that the site specific FMP reflects current site conditions before the start of fumigation.

Each site specific FMP must contain the following elements:

- **Applicator Information**
  - Name
  - Phone number
  - Pesticide applicator license number

- Employer name and address
- **General Site Information**
  - Application block location (e.g., county, township-range-section quadrant), address or global positioning system (GPS) coordinates
  - Name, address, and phone number of owner/operator of the application block
- **General Application Information**
  - Target application date/window
  - Brand name of fumigant
  - EPA registration number
- **Tarp Information and Procedures for Repair, Perforation and Removal**
  - Brand name, lot number, thickness
  - Name and phone number of person responsible for repairing tarps
  - Schedule for checking tarps for damage, tears, and other problems
  - Maximum time following notification of damage that the person(s) responsible for tarp repair will respond
  - Minimum time following application that tarp will be repaired
  - Minimum size of damage that will be repaired
  - Other factors used to determine when tarp repair will be conducted
  - Name and phone number of person responsible for perforating and/or removing tarps
  - Equipment/methods used to perforate tarps
  - Schedule and target dates for perforating tarps
  - Schedule and target dates for removing tarps
- **Soil Conditions**
  - Description of soil texture in application block
  - Method used to determine soil moisture
- **Weather Conditions**
  - Summary of forecasted conditions for the day of application
  - Summary of conditions in the 48-hour period following the fumigant application
    - Wind speed
    - Inversion conditions [e.g., shallow, compressed (low-level) temperature inversion]
    - Air stagnation advisory
- Air-purifying respirators, air-rescue devices, and other personal protective equipment (PPE) for handlers (handler task, protective clothing, air-purifying respirator type, respirator cartridge type, respirator cartridge replacement schedule, air-rescue device type, eye protection, gloves, other PPE)
- **Emergency Procedures**
  - Evacuation routes
  - Locations of telephones
  - Contact information for first responders
  - Local/state/federal/tribal contacts
  - Key personnel and emergency procedures/responsibilities in case of an incident
  - Equipment/tarp/seal failure or complaints
  - Other emergencies
- **Fumigant Treated Area Posting Procedures**
  - Person(s) who will post fumigant treated area signs
  - Location of fumigant treated area signs
  - Procedures for fumigant treated area sign removal

- Plan describing how communication will take place between applicator, land owner/operator, and other on-site handlers (e.g., tarp perforators/removers, irrigators) for complying with label requirements (e.g., timing of tarp perforation and removal, PPE)
  - Name and phone number of persons contacted
  - Date contacted
- **Authorized On Site Personnel**
  - Names, addresses and phone numbers of handlers
  - Names, addresses and phone numbers for employers of handlers
  - Tasks that each handler is authorized and trained to perform
  - For handlers designated to wear air-purifying respirators:
    - Date of medical qualification to wear an air-purifying respirator
    - Date of air-purifying respirator training and
    - Date of fit testing for the air-purifying respirator
- **Air Monitoring Plan**
  - If sensory irritation is experienced, indicate whether operations will cease or operations will continue with an air-purifying respirator.
  - If the intention is to cease operations when sensory irritation is experienced, provide name, address and phone number of the handler that will perform monitoring activities prior to operations resuming:
  - When air-purifying respirators are worn:
    - Representative handler tasks to be monitored
    - Monitoring equipment to be used and timing of monitoring
- **Good Agricultural Practices (GAPs)**
  - Description of applicable mandatory GAPs (registrants may also include optional GAPs)
  - Measurements and documentation to ensure GAPs are achieved (e.g., measurement of soil and other site conditions)
- **Description of Hazard Communication**
  - The application block has been posted in accordance with the label.
  - Pesticide product labels and material safety data sheets are on site and readily available for employees to review.
- **Recordkeeping Procedures**

The owner/operator of the application block as well as the certified applicator must keep a signed copy of the site specific FMP for two years from the date of the application.

For situations where an initial FMP is developed and certain elements do not change for multiple fumigation sites (e.g., applicator information, authorized on site personnel, recordkeeping procedures, emergency procedures), only elements that have changed need to be updated in the site specific FMP provided the following:

- The certified applicator supervising the application has verified that those elements are current and applicable to the application block before it is fumigated.
- Recordkeeping requirements are followed for the entire FMP (including elements that do not change).

Once the application begins, the certified applicator must make a copy of the FMP available for viewing by handlers involved in the fumigation. The certified applicator or the owner/operator of the application block must provide a copy of the FMP to any local/state/federal/tribal enforcement personnel who request the FMP. In the case of an emergency, the FMP must be made immediately available when requested by local/state/federal/tribal emergency response and enforcement personnel.

Within 30 days of completing the application portion of the fumigation process, the certified applicator supervising the application must complete a post-application summary that describes any deviations from the FMP that have occurred, measurements taken to comply with GAPs, monitoring results, as well as any complaints and/or incidents that have been reported to him/her.

The post-application summary must contain the following elements:

- **Application Information**
  - Actual application date
  - Actual application rate
  - Size of application block fumigated
- **Weather Conditions**
  - Summary of weather conditions on day of application
  - Summary of weather conditions during the 48-hour period following fumigant application
- **Soil Temperature Measurement**

If air temperatures were above 100°F on any of the three days prior to the application
- **Tarp Damage and Repair Information (if Applicable)**
  - Location and size of tarp damage
  - Description of tarp/tarp seal/tarp equipment failure
  - Date and time of tarp repair
- **Tarp Perforation/Removal Details**
  - Description of tarp removal (if different than in the FMP)
  - Date tarps were perforated
  - Date tarps were removed
- **Complaint Details (if Applicable)**
  - Person filing complaint (e.g., on site handler, person off site)
  - If off site person filing complaint
    - Name
    - Address
    - Phone number
  - Description of control measures or emergency procedures followed after complaint
- Description of incidents, equipment failure, or other emergency and emergency procedures followed (if applicable)
- **Details of Elevated Air Concentrations Monitored On Site (if Applicable)**
  - Location of elevated air concentration levels
  - Description of control measures or emergency procedures followed
  - Air monitoring results
    - When sensory irritation experienced:
      - Date and time of sensory irritation
      - Handler task/activity
      - Handler location where sensory irritation was observed
      - Resulting action (e.g., cease operations, continue operations with air-purifying respirators)
    - When using a direct read instrument:
      - Sample date and time
      - Handler task/activity
      - Handler location
      - Air concentration
      - Sampling method

- **Date of Fumigant Treated Area Sign Removal**

- **Any Deviations From the FMP**

- **Recordkeeping Procedures**

The owner/operator of the application block as well as the certified applicator must keep a signed copy of the post-application summary for two years from the date of application.

## **Entry Restricted Period and Notification Requirements**

### **Entry Restricted Period**

Entry (including early entry that would otherwise be permitted under the WPS) by any person – other than a correctly trained and PPE-equipped handler who is performing a handling task listed on this label – is **prohibited** from the start of the application until:

- 5 days (120 hours) after the application is complete if tarps are not perforated and removed for at least 14 days following application. **Note:** Persons installing, repairing, or monitoring tarps are handlers until 14 days after the application is complete if tarps are not perforated and removed during those 14 days or
- 48 hours after tarp perforation is complete if tarps will not be removed for at least 14 days following application or
- until tarp removal is completed if tarps are both perforated and removed less than 14 days after application

**Note:** See Tarp Perforation and/or Removal section for requirements about when tarps are allowed to be perforated.

### **Notification Requirements**

Notify workers of the application by warning them orally and by posting fumigant treated area signs. The fumigant treated area signs must bear the skull and crossbones symbol and state:

- "DANGER/PELIGRO"
- "Area under fumigation, DO NOT ENTER/NO ENTRE"
- "1,3-dichloropropene and chloropicrin fumigants in use"
- The date and time of fumigation
- The date and time entry prohibition period is over
- InLine
- Name, address, and telephone number of the certified applicator in charge of the fumigation.

Post the fumigant treated area sign instead of the WPS sign for this application, but follow all WPS requirements pertaining to location, legibility, size, and timing of posting and removal. Post the fumigant treated area signs at all entrances to the application block (i.e., field or portion of a field treated with a fumigant in any 24-hour period).

## **Application Directions**

### **Buffer Zone**

An application of InLine shall not be made within 100 feet of an occupied structure, such as a school, hospital, business or residence. No person shall be present at this structure at any time during the seven consecutive day period following application. **This buffer zone does not apply to use on soils that will not experience an additional 1,3-D treatment for at least three years, for example, on soils to be planted with perennial crops.**

## **Uses**

## Control of Nematodes

Use InLine for control of nematodes and symphylans, management of soil diseases, and suppression of wireworms in soils to be planted to vegetable crops, field crops, fruit and nut crops and nursery crops.

- Dilution rate as applied: 500 to 1500 ppm of InLine.
- 1500 ppm of 1,3-D is equivalent to 1 gallon of InLine in 540 gallons of water.

**Table 1. Application Rates for Nematodes, Symphylans, Wireworms and Certain Soil Borne Diseases**

Crops	Soil Type <sup>2</sup>	Broadcast Application Rates <sup>1</sup> (Gallons/Acre)
field crops vegetable crops <sup>3</sup>	mineral	13 to 20.5 <sup>4, 5</sup>
fruit and nut crops, including strawberry and pineapple nursery crops	mineral	29 to 38.4 29 to 56

<sup>1</sup>Rates given are the maximum broadcast equivalent rate.

<sup>2</sup>Not intended for use on muck or peat soils.

<sup>3</sup>For cyst-forming nematodes increase dosage to 26 gpa. For management of *Phytophthora* and *Fusarium* diseases, increase dosage to 35 gpa.

<sup>4</sup>For use in a second crop culture or when disease pressure is a concern, the upper end of the rate range is recommended.

<sup>5</sup>To control symphylans (garden centipedes), apply at 15.5 gallons or more per acre, and apply during late summer or early fall when the soil is warm. To suppress wireworms, use dosages specified for nematodes.

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48  
40

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

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**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
**APR 30 2010**  
**Under the Federal Insecticide,**  
**Fungicide, and Rodenticide Act**  
**as amended, for the pesticide**  
**registered under EPA Reg. No.**  
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