



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 23 2003

Ms. Betty Lilyquist
D & D Holdings, Inc.
PO Box 116
Weyers Cave, VA 24486

Subject: Revised Labeling to Require a FMP and Other MOA Revisions
Degesch Magtoxin® Prepac Spot Fumigant
EPA Reg. No. 72959-7
Your Application Dated June 30,2003

Dear Ms. Lilyquist:

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

- The center panel of the container labeling must include the Skull and Crossbones Symbol. Draft labeling submitted to, and accepted by, the Agency should indicate that this symbol is present since this is the labeling that is stamped and placed on the Agency's website. This requirement also applies to the front panel of the Applicator's Manual.
- On the left panel of the container label, delete the statement appearing under the Directions for Use heading: "This product is for use against insects which infest stored commodities, and control of burrowing pests." This statement is not appropriate for this product.
- On the front panel of the Applicator's Manual and the center panel of the container label, replace the word "there" with "their" in the Restricted Use Statement, ie. "For retail sale to Dealers..."

- On the front page of the Applicator's Manual, in the box at the top of the page, a portion of the 1-800 number is missing. Please make the appropriate correction.
- On page 6 of the Manual, in section 4.1 under the Precautionary Statements heading, reference is made in the fourth sentence to the Industrial Hygiene Monitoring section and identifies it as section 13.6. This is incorrect, it should be section 14.6.
- On page 7 of the Manual, in section 6 under "Exposure Conditions" and at the end of the paragraph, the correct reference for "Disposal Instructions" should be section 22, not 20.2.
- On page 8 of the Manual, in section 9.1, please define the acronym "STELs".
- In section 9.3 on page 9 of the Manual, delete the instruction appearing in parentheses regarding availability of SCBA, "(for example, at a fire station or rescue squad)". It is unlikely that a rescue squad would be willing to lend its equipment. Therefore, SCBA must be present at the site as part of the mandatory equipment for use of PH3.
- Pages 11 and 12 of the Manual include information on fumigated commodities, specifically section 14.5, "Handling Unaerated Commodities" and section 17, "Aeration of Fumigated Commodities." Since Magtoxin is labeled for treatment of machinery and equipment only, these sections really aren't appropriate and should be removed from the Manual.
- In the second sentence of section 14.4 at the top of page 11 of the Manual, change the word "general" to "generally".
- In section 21 on page 17, the word "assure" is missing from the first sentence, ie. "...so as to keep to a minimum any exposures to phosphine gas and to help assure adequate control of the insect pests."
- On page 13 of the Manual, in section 18.1 change "aluminum phosphide" to "magnesium phosphide" in the sentence preceding the NFPA categories.
- In the Transport Designations in section 19.1 on page 13 of the Manual, please confirm that Identification No. UN 2011 is the designation appropriate to this product.
- As you discussed with Meredith Laws on August 11, 2003, please insert the words "and follow" in the first sentence of section 20, "Fumigation Management Plan" on page 13. The sentence should read:

"The certified applicator is responsible for working with the owners and/or responsible employees of the structure and/or area to be fumigated to develop and follow a Fumigation Management Plan (FMP)."

- On page 15 of the Manual, delete item A.1.b., "Elimination of vertebrate pests" since this reference is not appropriate for this product.
- In the Disposal Instructions on page 18, section 22.1, the reference to section 10 for the Spill and Leak Procedures is incorrect. It should be section 23.
- On page 20 of the Manual, in the fourth paragraph, the reference to section 10.2 for the wet deactivation procedure is incorrect. Please change it to 22.3. Additionally in this paragraph, please fill in the blank reference in the third sentence.
- In section 23.2 of the Manual on page 20, please replace the period with a comma in the first sentence of the paragraph beginning "Caution: if worker..."
- On page 20, in the eighth paragraph, the word "gas" is repeated twice at the end of the paragraph. Please correct this.
- On page 20, delete the final sentence: "The EPA has determined that proper disposal of aluminum phosphide will cause no unreasonable adverse effects to the environment."

The Memorandum of Agreement between the Agency and the Registrants of phosphine based fumigants requires that within six (6) months of receiving stamped and approved labels from the Agency, all phosphine products released for shipment shall bear the amended and approved labels and be accompanied by the Applicator's Manuals. Additionally, please submit two (2) copies of the finished, corrected labeling to the Insecticide-Rodenticide Branch of the Registration Division prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records. If you have any questions regarding this action, please contact me at (703) 305-7546.

Sincerely,



Dan Kenny
Product Manager 1
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

4/27

ACCEPTED
with COMMENTS
In EPA Letter Dated
Sept. 23, 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
72959-7

(CENTER PANEL)

THIS PRODUCT MUST BE ACCOMPANIED WITH AN APPROVED APPLICATOR'S MANUAL READ AND UNDERSTAND THE ENTIRE LABELING. CONSULT WITH YOUR STATE LEAD PESTICIDE REGULATORY AGENCY TO DETERMINE REGULATORY STATUS, REQUIREMENTS, AND RESTRICTIONS FOR FUMIGATION USE IN THAT STATE. CALL DEGESCH AMERICA, INC. IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABEL.

**RESTRICTED USE PESTICIDE
DUE TO ACUTE INHALATION TOXICITY OF PHOSPHINE GAS**

For retail sale to Dealers and Certified Applicators only. For use by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification. Refer to the directions in the applicator manual for requirements of the physical presence of a Certified Applicator.

**DEGESCH MAGTOXIN®
PREPAC SPOT FUMIGANT**

Patent No. 4653644
FOR SPOT TREATMENT OF FOOD AND FEED PROCESSING
MACHINERY AND EQUIPMENT

ACTIVE INGREDIENT: MAGNESIUM PHOSPHIDE.....	66.0%
OTHER INGREDIENTS	34.0%
TOTAL.....	100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER/PELIGRO - POISON**

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este productor hasta que la etiqueta se le haya sido explicado ampliamente.
(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

FIRST AID

Symptoms of overexposure are headache, dizziness, nausea, difficult breathing, vomiting, and diarrhea. In all cases of overexposure, get medical attention immediately. Take victim to a doctor or emergency treatment facility.

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.
- Keep warm and make sure person can breathe freely.
- Call a poison control center or doctor for further treatment advise.

If swallowed:

- Call a poison control center or doctor immediately for treatment advise.
- Have person drink one or two glasses of water and induce vomiting by touching back of throat with finger, or if available administer syrup of ipecac.
- Do not give anything by mouth if victim is unconscious or not alert.

If on skin or clothing:

- Brush or shake material off clothes and shoes in a well ventilated area.
- Allow cloths to aerate in a ventilated area prior to laundering.
- Do not leave contaminated clothing in occupied and/or confined areas such as automobiles, vans, motel rooms, etc.
- Wash contaminated skin thoroughly with soap and water.

If in eyes:

- Hold eye open and rinse slowly and gently with water 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 further treatment advise.

HOT LINE NUMBER

Have the product container or label or applicator's manual with you when calling a poison control center or doctor, or going for treatment. You may also contact Degesch America, Inc. - (540) 234-9281/1-800-330-2525 or CHEMTREC - 1-800-424-9300
See side panels for additional precautionary statements.

D & D HOLDINGS, INC.
P. O. Box 116
153 Triangle Drive
Weyers Cave, VA 24486 USA
Telephone: (540) 234-9281/1-800-330-2525
Fax: (540) 234-8225
Internet: www.degeschamerica.com
E-mail: degesch@degeschamerica.com
EPA Est. No. 40285-VA-01
EPA Reg. No. 72959-7

Contents: 12 pouches per pail, each pouch containing 5 interconnected Prepacs.
Total: 60 Prepacs. Each Prepac contains 66 Magtoxin Pellets
Net Weight: 2.376 kg (5.23 lbs.)

(LEFT PANEL)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Magnesium phosphide from DEGESCH Magtoxin® Prepacs, Pellets, Tablets-R or dust may be fatal if swallowed. Do not get in eyes, on skin, or on clothing. Do not eat, drink or smoke while handling magnesium phosphide fumigants. If a sealed container is opened, or if the material comes into contact with moisture, water or acids, these products will release phosphine which is an extremely toxic gas. If a garlic odor is detected, refer to the section on Industrial Hygiene Monitoring in the Applicator's Manual for appropriate monitoring procedures. Pure hydrogen phosphide gas is odorless; the garlic odor is due to a contaminant. Since the odor of hydrogen phosphide may not be detected under some circumstances, the absence of a garlic odor does not mean that dangerous levels of hydrogen phosphide gas are absent. Observe proper reentry procedures specified elsewhere in the labeling to prevent overexposure.

PHYSICAL AND CHEMICAL HAZARDS

Magnesium phosphide in Prepacs, tablets, pellets and partially spent dust will release hydrogen phosphide if exposed to moisture from the air or if it comes into contact with water, acids and many other liquids. Magnesium phosphide is considerably more reactive than is aluminum phosphide and will liberate gas more rapidly. This is particularly true in the presence of liquid water and at higher temperatures. Since hydrogen phosphide may ignite spontaneously at levels above its lower flammable limit of 1.8% v/v, it is important not to exceed this concentration. Magnesium phosphide fumigants should not be stacked or piled up or contacted with liquid water. This may cause a temperature increase, increase the rate of gas production and confine the gas so that ignition could occur. It is preferable to open containers of magnesium phosphide products in open air as under certain conditions they may flash upon opening. Containers may also be opened near a fan or other appropriate ventilation which will rapidly exhaust contaminated air. When opening, point the container away from the face and body. Although the chances for a flash are very remote, never open containers of metal phosphide fumigants in a flammable atmosphere. These precautions will also reduce the fumigator's exposure to hydrogen phosphide.

Pure phosphine gas is practically insoluble in water, fats and oils, and is stable at normal fumigation temperatures. However, it may react with certain metals and cause corrosion, especially at higher temperatures and relative humidities. Metals such as copper, brass, and other copper alloys, and precious metals such as gold and silver are susceptible to corrosion by phosphine. Thus small electric motors, smoke detectors, brass sprinkler heads, batteries and battery chargers, forklifts, temperature monitoring systems, switching gears, communication devices, computers, calculators, and other electronic equipment should be protected or removed before fumigation. Phosphine will also react with certain metallic salts and, therefore, sensitive items such as photographic film, some inorganic pigments, etc. should not be exposed.

NOTE TO PHYSICIAN

Magnesium phosphide tablets, pellets or dust reacts with moisture from the air, acids and many other liquids to release hydrogen phosphine gas. Mild exposure by inhalation causes malaise (indefinite feeling of sickness), ringing of ears, fatigue, nausea, and pressure in the chest, which is relieved by removal to fresh air. Moderate poisoning causes weakness, vomiting, pain just above the stomach, chest pain, diarrhea and dyspnea (difficulty in breathing). Symptoms of severe poisoning may occur within a few hours to several days, resulting in pulmonary edema (fluid in lungs) and may lead to dizziness, cyanosis (blue or purple skin color), unconsciousness, and death.

In sufficient quantity, phosphine affects the liver, kidneys, lungs, nervous system and circulatory system. Inhalation can cause lung edema (fluid in lungs) and hyperemia (excess of blood in a body part), small perivascular brain hemorrhage and brain edema (fluid in brain). Ingestion can cause lung and brain symptoms but damage to the viscera (body cavity organs) is more common. Phosphine poisoning may result in (1) pulmonary edema, (2) liver elevated serum GOT, LDH and alkaline phosphatase, reduced prothrombin, hemorrhage and jaundice (yellow skin color) and (3) kidney hematuria (blood in urine) and anuria (abnormal or lack of urination). Pathology is characteristic of hypoxia (oxygen deficiency in blood tissue). Subchronic exposures to low concentrations over a period of days or weeks may cause poisoning. Treatment is symptomatic.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. THIS PRODUCT IS FOR USE AGAINST INSECTS WHICH INFEST STORED COMMODITIES, AND CONTROL OF BURROWING PESTS. *delete*

Refer to the Applicator's Manual for more detailed precautions, recommendations and directions for use.

FORM 18520

(RIGHT PANEL)

STORAGE AND DISPOSAL**Do not contaminate water, food or feed by storing pesticides in the same areas used to store these commodities.****Storage Instructions:**

1. Store **Magtoxin®** in a dry, well ventilated area away from heat, under lock and key. Post as a pesticide storage area. Do not contaminate water, food or feed by storing pesticides in the same areas used to store these commodities.
2. Do not store in buildings where humans or domestic animals reside. Keep out of reach of children.
3. DEGESCH **Magtoxin®** Prepac's are supplied in gas-tight foil pouches. However, once opened for fumigation, the entire contents of the aluminum foil pouch must be used as it cannot be resealed.
4. The shelf life of **Magtoxin®** is virtually unlimited as long as the pouches are not opened.

Pesticide Disposal:

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

Unreacted or partially reacted **Magtoxin®** is acutely hazardous. Improper disposal of excess pesticide 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. For specific instructions, see Disposal Instructions and Spill and Leak Procedures in the Applicator's Manual.

Some local and state waste disposal regulations may vary from the following recommendations. Disposal procedures should be reviewed with appropriate authorities to ensure compliance with local regulations. Contact your State Pesticide or Environmental Control Agency or Hazardous Waste Specialist at the nearest EPA Regional Office for guidance.

Container Disposal

Dispose of pouches and pails in a sanitary landfill or by other procedures approved by state and local authorities.

If properly exposed, the residual dust remaining after a fumigation with **Magtoxin** will be a dark gray and contain only a small amount of unreacted magnesium phosphide. However, residual dust from incompletely exposed **Magtoxin** will require special care.

SPILL AND LEAK PROCEDURES:**General Precautions and Directions:**

A spill, other than incidental to application or normal handling, may produce high levels of gas and, therefore, attending personnel must wear SCBA or its equivalent when the concentration of phosphine gas is unknown. Other NIOSH/MSHA approved respiratory protection may be worn if the concentration is known. Do **not** use water at any time to clean up a spill of **Magtoxin®**. Water in contact with unreacted tablets or pellets will greatly accelerate the production of phosphine gas, which could result in a toxic and/or fire hazard. Wear dry gloves of cotton or other material when handling magnesium phosphide.

Return all intact pouches to pails, cardboard cases or other suitable packaging which has been properly marked according to DOT regulations. Notify consignee and shipper of damaged pouches and pails. If aluminum foil pouches have been punctured or damaged so as to leak, they may be temporarily repaired with aluminum tape. Transport the damaged containers to an area suitable for pesticide storage for inspection. Refer to the Applicator's Manual for more detailed Spill and Leak Procedures. Further instructions and recommendations may be obtained, if required, from DEGESCH America, Inc.

WARRANTY: Seller warrants that the product conforms to its chemical description and when used according to label directions under normal conditions of use, it is reasonably fit for the purposes stated on the label. Seller makes no other warranty, either express or implied, and Buyer assumes all risk should the product be used contrary to label instructions.

June 30, 2003 dai/bjl

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APPLICATOR'S MANUAL

for

DEGESCH MAGTOXIN® PREPAC SPOT FUMIGANT

Patent No. 4653644

THIS PRODUCT MUST BE ACCOMPANIED BY AN APPROVED LABEL AND APPLICATOR'S MANUAL. READ AND UNDERSTAND THE ENTIRE LABELING AND APPLICATOR'S MANUAL. ALL PARTS OF THE LABELING AND APPLICATOR'S MANUAL ARE EQUALLY IMPORTANT FOR SAFE AND EFFECTIVE USE OF THESE PRODUCTS. CONSULT WITH YOUR STATE LEAD PESTICIDE REGULATORY AGENCY TO DETERMINE REGULATORY STATUS, REQUIREMENTS, AND RESTRICTIONS FOR FUMIGATION USE IN THAT STATE. CALL 540-234-9281/1-800-2525 IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABELING.



RESTRICTED USE PESTICIDE

DUE TO ACUTE INHALATION TOXICITY OF HIGHLY TOXIC PHOSPHINE GAS

For retail sale to Dealers and Certified Applicators only. For use by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification. Refer to the directions in this applicator manual for requirements of the physical presence of a Certified Applicator.

7x

FOR SPOT TREATMENT OF FOOD AND FEED PROCESSING MACHINERY AND EQUIPMENT

Active Ingredient: Magnesium Phosphide.....	66.0%
Other Ingredients.....	34.0%
Total.....	100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER - POISON - PELIGRO

Keep out of reach of children

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta se le haya sido explicado ampliamente.

(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

D & D HOLDINGS, INC.
PO Box 116
153 Triangle Drive
Weyers Cave, Virginia 24486 USA
Telephone (540) 234-9281/1-800-330-2525
Fax: (540) 234-8225
Internet: www.degeschamerica.com
e-mail: Degesch@degeschamerica.com
EPA Est. No. 40285-VA-01
EPA Reg. No. 72959-7

ACCEPTED
with COMMENTS
in EPA Letter Dated
Sept. 23, 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
72959-7

(inside cover)

WARRANTY

Seller warrants that the product conforms to its chemical description and when used according to label directions under normal conditions of use, it is reasonably fit for the purposes stated on the label. Seller makes no other warranty, either express or implied, and buyer assumes all risk should the product be used contrary to label instructions.

TABLE OF CONTENTS

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1. FIRST AID

Symptoms of exposure to this product are headache, dizziness, nausea, difficult breathing, vomiting, and diarrhea. In all cases of overexposure get medical attention immediately. Take victim to a doctor or emergency treatment facility.

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration immediately, by mouth-to-mouth if possible.
- Keep warm and make sure person can breathe freely.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have a person drink one or two glasses of water and induce vomiting by touching back of throat with finger, or if available administer syrup of ipecac.
- Do not give anything by mouth to an unconscious person.

If on skin or clothing;

- Brush or shake material off clothes and shoes in a well-ventilated area. Allow clothes to aerate in a ventilated area prior to laundering.
- Do not leave contaminated clothing in occupied and/or confined areas such as automobiles, vans, motel rooms, etc.
- Wash contaminated skin thoroughly with soap and water.

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.

HOT LINE NUMBER

Have the product container or label or applicator's manual with you when calling a poison control center or doctor, or going for treatment. You may also contact DEGESCH AMERICA, INC. - (540) 234-9281/1800-330-2525 or Chemtrec - 1-800-424-9300 for emergency medical treatment.

2 NOTE TO PHYSICIAN

Magnesium phosphide Plates, Strips, tablets, pellets or dust react with moisture from the air, acids and many other liquids to release phosphide gas. Mild inhalation exposure causes malaise (indefinite feeling of sickness), ringing in the ears, fatigue, nausea and pressure in the chest, which is relieved by removal to fresh air. Moderate poisoning causes weakness, vomiting, pain just above the stomach, chest pain, diarrhea and dyspnea (difficulty in breathing). Symptoms of severe poisoning may occur within a few hours to several days resulting in pulmonary edema (fluid in lungs) and may lead to dizziness, cyanosis (blue or purple skin color), unconsciousness, and death.

In sufficient quantity, phosphine affects the liver, kidneys, lungs, nervous system and circulatory system. Inhalation can cause lung edema (fluid in lungs) and hyperemia (excess of blood in a body part), small perivascular brain hemorrhages and brain edema (fluid in brain). Ingestion can cause lung and brain symptoms but damage to the viscera (body cavity organs) is more common. Phosphine poisoning may result in (1) pulmonary edema, (2) liver elevated serum GOT, LDH and alkaline phosphatase, reduced prothrombin, hemorrhage and jaundice (yellow skin color) and (3) kidney hematuria (blood in urine) and anuria (abnormal or lack of urination). Pathology is characteristic of hypoxia (oxygen deficiency in body tissue). Frequent exposure to concentrations above permissible levels over a period of days or weeks may cause poisoning. Treatment is symptomatic.

The following measures are suggested for use by the physician in accordance with his own judgment: In its milder forms, symptoms of poisoning may take some time (up to 24 hours) to make their appearance, and the following is suggested:

1. Give complete rest for 1-2 days, during which the patient must be kept quiet and warm.
2. Should patient suffer from vomiting or increased blood sugar, appropriate solutions should be administered. Treatment with oxygen breathing equipment is recommended as is the administration of cardiac and circulatory stimulants.

In cases of severe poisoning (intensive care unit recommended):

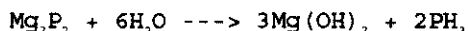
1. Where pulmonary edema is observed, steroid therapy should be considered and close medical supervision is recommended. Blood transfusions may be necessary.
2. In case of manifest pulmonary edema, venesection should be performed under vein.

pressure control. Heart glycosides (I.V.) (in case of hemoconcentration, venesection may result in shock). On progressive edema of the lungs: immediate intubation with a constant removal of edema fluid and oxygen over-pressure respiration, as well as any measures required for shock treatment. In case of kidney failure, extracorporeal hemodialysis is necessary. There is no specific antidote known for this poisoning.

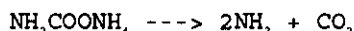
- 3. Mention should be made here of suicidal attempts by taking solid phosphide by mouth. After swallowing: emptying of the stomach by vomiting, flushing of the stomach with diluted potassium permanganate solution or a solution of magnesium peroxide until flushing liquid ceases to smell of carbide. Thereafter, apply medicinal charcoal.

3. INTRODUCTION

DEGESCH metal phosphide products are most often used for the protection of stored commodities from damage by insects. However, the **Magtoxin** Prepac Spot Fumigant has been specially manufactured for the treatment of food and feed processing machinery and equipment to control insect infestations arising inside this equipment. Spot fumigation may be defined as the short-term treatment of processing machinery and equipment with toxic vapors for control of the adult and larval life stages of insects which, infest food and feed particles remaining within the equipment. These spot treatments are intended to interrupt the life cycles of the insect pests. Since one or more life stages may survive this short-term treatment, spot fumigations must be repeated periodically to control insect infestation. DEGESCH metal phosphide fumigants are acted upon by atmospheric moisture to produce phosphine gas. **Magtoxin** contains magnesium phosphide (Mg₃P₂) as its active ingredient and will liberate phosphine gas via the following chemical reaction:



Phosphine gas is highly toxic to insects, vertebrate pests, humans and other forms of animal life. In addition to its toxic properties, the gas will corrode certain metals and may ignite spontaneously in air at concentrations above its lower flammable limit of 1.8%(v/v). These hazards will be described in greater detail later on in this Applicator's Manual for DEGESCH **Magtoxin** Prepac Spot Fumigant. **Magtoxin** also contains ammonium carbamate which, liberates ammonia and carbon dioxide as follows:



These gases are essentially nonflammable and act as inerting agents to reduce fire hazards. The ammonia gas also serves as a warning agent.

The **Magtoxin** Prepac Spot Fumigant consists of a gas-permeable blister pack of **Magtoxin** Pellets. Each **Magtoxin** Prepac strip is roughly 4-1/4" x 16" and contains 33 blisters, each blister containing 2 pellets for a total of 66 pellets per strip. **Magtoxin** pellets weigh approximately 0.6g each and release 0.2g of phosphine gas gas. Each **Magtoxin** Prepac then will release 13.2g of phosphine gas. The strips are connected end-to-end, 5 Prepac strips in a row, and sealed into gas-tight aluminum foil pouches. The pouches are packed into covered metal pails, 12 pouches or 60 **Magtoxin** Prepac per pail. Each pail contains 3960 **Magtoxin** pellets, which weigh a total of 2376g and will liberate 792g of phosphine gas gas. The pails are constructed to conform to D.O.T. Specification 37A; Steel Drums.

Upon opening the aluminum foil pouch, atmospheric moisture penetrates the porous fleece material on the top and bottom of the **Magtoxin** Prepac. The **Magtoxin** pellets then begin to react to produce small quantities of phosphine gas, which diffuses out through the fleece into the surrounding space. This reaction starts slowly, gradually accelerates and then tapers off as the magnesium phosphide is spent. The rate of decomposition of the **Magtoxin** Prepac will vary depending upon moisture and temperature conditions. For example, when moisture and temperature are high, decomposition of **Magtoxin** Prepac may be complete in less than 10 hours. However, at lower ambient temperatures and relative humidity levels, decomposition may require 4 days or more.

After decomposition, **Magtoxin** leaves a dark gray powder composed almost entirely of magnesium hydroxide and other approved inert ingredients. This powder will be retained



inside the fleece of the Prepac strip and may be retrieved after fumigation so as not to contaminate the treated commodity. The spent **Magtoxin** Prepac must not be allowed to contaminate the processed food or feed. Therefore, it must be retrieved after fumigation prior to starting up the processing line unless the spot fumigant has been applied to a fumiport or in some other fashion so as to ensure that it is retained and will not enter the food or feed stream. If properly exposed, the spent **Magtoxin** Prepac will normally contain only a small amount of unreacted magnesium phosphide and may be disposed of without hazard. This is not considered a hazardous waste. However, partially spent residual from incompletely exposed **Magtoxin** Prepacs will require special care. Precautions and instructions for further deactivation and disposal will be given later in this Manual.

Magtoxin Prepacs are supplied in gas-tight containers, and their shelf life is unlimited as long as the packaging remains intact. However, once opened for fumigation, the entire contents of the aluminum foil pouch must be used as it cannot be resealed. Storage and handling instructions will be given in detail later in the Applicator's Manual.

4. PRECAUTIONARY STATEMENTS

4.1 Hazards to Humans and Domestic Animals

DANGER: Magnesium phosphide from **Magtoxin Prepac Spot Fumigant** or dust may be fatal if swallowed. Do not get in eyes, on skin or on clothing. Do not eat, drink or smoke while handling magnesium phosphide fumigants. If a sealed container is opened, or if the material comes into contact with moisture, water or acids, these products will release phosphine gas which, is an extremely toxic gas. If a garlic odor is detected, refer to the Industrial Hygiene Monitoring section found in section 13.6 of this manual for appropriate monitoring procedures. Pure phosphine gas is odorless, the garlic odor is due to a contaminant. Since the odor of phosphine gas may not be detected under some circumstances, the absence of a garlic odor does not mean that dangerous levels of phosphine gas are absent. Observe proper reentry procedures specified elsewhere in the labeling to prevent overexposure

does not exist should be 17.6

4.2 Physical and Chemical Hazards

Magnesium phosphide-based fumigants such as Plates, Strips, Prepac Spot Fumigant and partially spent materials will release phosphine gas if exposed to moisture from the air or if it comes into contact with water, acids and many other liquids. Magnesium phosphide is considerably more reactive than is aluminum phosphide and will liberate gas more rapidly. This is particularly true in the presence of liquid water and at higher temperatures. Since phosphine gas may ignite spontaneously at levels above its lower flammable limit of 1.8% v/v, it is important not to exceed this concentration. Ignition of high concentrations of phosphine gas can produce a very energetic reaction. Flashes can occur under these conditions and may cause severe personal injury. Never allow the buildup of phosphine gas to exceed explosive concentrations. Do not confine spent or partially spent metal phosphide fumigants as the slow release of phosphine gas from this material may result in formation of an explosive atmosphere. Magnesium phosphide fumigants should not be stacked, piled up or contacted with liquid water. This may cause a temperature increase, increase the rate of gas production and confine the gas so that ignition could occur.

It is preferable to open containers of magnesium phosphide products in open air as under certain conditions, they may flash upon opening. Containers may also be opened near a fan or other appropriate ventilation, which will rapidly exhaust contaminated air. When opening pouches of **Magtoxin Prepac**, point the pouch away from the face and body and tear or cut open the far end. Although the chances for a flash are very remote, never open containers of metal phosphide fumigants in a flammable atmosphere. These precautions will also reduce the fumigator's exposure to phosphine gas.

Pure phosphine gas is practically insoluble in water, fats and oils, and is stable at normal fumigation temperatures. However, it may react with certain metals and cause corrosion, especially at higher temperatures and relative humidity. Metals such as copper, brass and other copper alloys, and precious metals such as gold and silver are

susceptible to corrosion by phosphine. Thus, small electric motors, smoke detectors, brass sprinkler heads, batteries and battery chargers, fork lifts, temperature monitoring systems, switching gears, communication devices, computers, calculators and other electrical equipment should be protected or removed before fumigation. Phosphine gas will also react with certain metallic salts and, therefore, sensitive items such as photographic film, some inorganic pigments, etc., should not be exposed. Immediately after addition of Magtoxin Prepac turn off any lights and non-essential electric equipment.

Read and follow the label and the Applicator's Manual. The Manual contains complete instructions for the safe use of the pesticide. Additional copies of this Manual are available from:

DEGESCH America, Inc.
153 TRIANGLE DRIVE
P. O. Box 116
Weyers Cave, VA 24486
Telephone: (540) 234-9281/1-800-330-2525
Fax: (540) 234-8225

Internet: www.degeschamerica.com

DIRECTIONS FOR USE

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

4. EQUIPMENT WHICH MAY BE FUMIGATED

Spot fumigation is the short-term treatment with phosphine for control of the adult and larval life stages of insects, which infest food particles remaining within the equipment.

- Bins
- Silos
- Holding tanks
- Elevator boots, heads, filters, conveyers, spouting, and purifiers
- Food processing equipment, such as sifters, rollers, dusters
- Related equipment in mills, food and feed processing plants, breweries, and similar industries.

6. EXPOSURE CONDITIONS

Spot fumigations with **Magtoxin** must not be conducted when air temperatures are below 40°F (5°C). The minimum duration of the spot fumigation is 34 hours. This exposure period serves not only to control the infestation, but to allow ample time for reaction of the Prepac. Deactivation and disposal of **Magtoxin** Prepac that are only partially spent will require extra care and precautions. See recommendations given under "Disposal Instructions" found in section 20.2 of this manual.

The minimum exposure time of 34 hours is not long enough to ensure control of pupae or eggs. In addition, much of the equipment to be treated is of loose or open construction and cannot readily be sealed. Other than in bins and tanks, it is not unusual for virtually all of the phosphine gas to have leaked out in 24 hours or less. Since this type of treatment merely interrupts the life cycle of the insect pests, spot fumigations need to be performed at regular intervals, of one month or less, until the problem is brought under control.

It is recommended that gas concentration measurements be made and/or test insect cages be placed inside the treated equipment to determine efficacy and to ensure that sealing has been adequate. A good rule of thumb for obtaining satisfactory results is a minimum of 50 to 100 ppm phosphine gas remaining 10 hours after application of the **Magtoxin** Prepac Spot Fumigant. Once a particular facility has been treated successfully several times and trouble spots eliminated the frequency of efficacy checks and/or concentration may be reduced.

There are many situations in which the use of **Magtoxin** Prepac Spot Fumigant alone will not solve the infestation problem, and it is generally necessary to use other sanitation techniques. The equipment should be cleaned and run to empty prior to spot fumigation. Dead stock should be removed by vacuuming or other means. Fogging with EPA-approved pesticides is recommended in conjunction with spot fumigation to aid in controlling infestations outside of the machinery and in pieces of equipment, which it is not practical or possible to seal.

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addition to careful sealing prior to treatment, it is a good idea to repair and maintain equipment in proper working condition so as to reduce leaks.

7. DOSAGE RATE GUIDELINES

Allowable and Recommended Dosages Rates

Phosphine is a mobile gas and will penetrate to all parts of the treatment area. Therefore, dosage must be based upon the total volume of the space being treated. Each Magtoxin Prepac contains 33 blisters, each holding 2 Magtoxin Pellets. Each Magtoxin Pellet will liberate 0.2 g of phosphine gas for a total of 13.2 g of gas per Prepac. The Prepacs are supplied in a continuous roll of five Prepacs connected end to end. The appropriate amount of fumigant for application to the machinery may be cut from the roll of Prepacs using sharp scissors or other cutting tool.

7.1 Maximum Allowable Dosage Guidelines for Fumigation with Magtoxin Prepac.

10 Magtoxin Prepacs per 1320 cubic feet
(100 grams of phosphine gas per 1000 cubic feet).

7.2 Recommended Magtoxin Prepac Dosages for Various Types of Fumigation.

The recommended dosage is 1 - 2 Prepacs per 1320 cubic feet in equipment that is relatively gas tight or which can readily be sealed. This corresponds to a dose of 10 - 20 grams of phosphine gas per 1000 cubic feet.

It is permissible to use up to 10 Prepacs per 1320 cubic feet, 100 grams of phosphine gas per 1000 cubic feet, in sifters, purifiers and other pieces of equipment which cannot readily be sealed.

Increased dosage will not completely compensate for gas leaks from poorly sealed or open equipment. In many cases, use of fogging or other sanitation techniques should be relied upon rather than increasing dosage of **Magtoxin Prepac Spot Fumigant**.

8. PROTECTIVE CLOTHING

It is necessary to wear gloves or other protective clothing when handling **DEGESCH Magtoxin Prepac Spot Fumigant**, however:

- Wear dry gloves of cotton or other material if contact with metal phosphide or its dust is likely.
- Gloves should remain dry during use.
- Wash hands thoroughly after handling magnesium phosphide products.
- Aerate used gloves and other clothing that may be contaminated in a well ventilated area prior to laundering.

9. RESPIRATORY PROTECTION

9.1 When Respiratory Protection Must Be Worn

Respiratory protection approved by the National Institute for Occupational Safety and Health/Mine Safety and Health Administration (NIOSH/MSHA) must be worn during exposure to concentrations in excess of permitted limits or when concentrations are unknown. Self-contained breathing apparatus (SCBA) must be worn during entry into sites that are under fumigation if the concentration of phosphine is unknown or known to exceed the STELs for phosphine (1 ppm for 15 minutes).

9.2 Permissible Gas Concentration Ranges for Respiratory Protection Devices

A NIOSH/MSHA approved full-face gas mask - phosphine canister combination may be used at levels up to 15 ppm or following manufacturers use conditions instructions for escape. Above 15 ppm or in situations where the phosphine concentration is unknown, a NIOSH/MSHA approved SCBA must be worn. - The NIOSH/OSHA Pocket Guide DHHS (NIOSH) 97-140 or the NIOSH ALERT - Preventing Phosphine Poisoning and Explosions During Fumigation, lists these and other types of approved respirators and the concentrations

limits at which they may be used.

9.3 **Requirements for Availability of Respiratory Protection**

If metal phosphide products are to be applied from within the structure to be fumigated, an approved full-face gas mask - phosphine canister combination or self-contained breathing apparatus (SCBA) or its equivalent must be available at the site of application in case it is needed. SCBA or its equivalent must be available locally, (for example, at fire station or rescue squad) if it is not available at the fumigation site.

No

Respiratory protection need not be available for applications from outside the area to be fumigated such as addition of tablets or pellets to automatic dispensing devices, outdoor applications, etc., if exposures above the permitted exposure limits will not be encountered.

If monitoring equipment is not available on a farm and application of fumigant cannot be made from outside the structure, an approved canister respirator must be worn during application from within the structure being treated. However, if entry into an on farm structure that is under fumigation, is required SCBA must be worn if the gas concentration is unknown or above the permissible limits.

10. **Requirements for Certified Applicator to be present and responsible for all workers as follows:**

- A. A Certified Applicator must be physically present, responsible for, and maintain visual and/or voice contact with all fumigation workers during the application of the fumigant. Once the application is complete and the structure has been made secure the certified applicator does not need to be physically present at the site.
- B. A Certified Applicator must be physically present, responsible for and maintain visual and/or voice contact with all fumigation workers during the initial opening of the fumigation structure for aeration. Once the aeration process is secured and monitoring has established that aeration can be completed safely the certified applicator does not need to be physically present and trained person(s) can complete the process and remove the placards.
- C. Degech Magtoxin Prepac Spot Fumigant may not be applied directly to railcars, containers or other transport vehicles for in transit fumigation.

11. **AUTHORIZED TRAINING**

The trained person(s) must be trained by a Certified Applicator following the EPA accepted product applicators manual; or by other training, which is accepted by local and or state authorities. When training has been completed and the employee demonstrates safety knowledge proficiency, the training date must be logged and maintained in the employee's safety training record for a minimum of three years. Refresher training must be done on an annual basis.

This training must cover the following items, each of which may be found in this manual:

- a. How to aerate and verify no more than 0.3 ppm phosphine remains in the storage area,
Or
- b. How to transfer the commodity to another storage area without prior aeration and ensure that worker safety limits are not being exceeded during the transfer.
- c. How to determine when respiratory protection must be worn.
- d. How to protect workers and nearby persons from exposure to levels above the 8-hour time weight average (TWA) of 0.3 ppm or the 15 minute TWA short-term exposure limit (STEL) of 1.0 ppm phosphine.
- e. Proper removal of placards.
- f. How to follow proper residual disposal instructions.

12. GAS DETECTION EQUIPMENT

There are a number of devices on the market for the measurement of phosphine gas at both industrial hygiene and fumigation levels. Glass detection tubes used in conjunction with the appropriate hand-operated air sampling pumps are widely used. These devices are portable, simple to use, do not require extensive training and are relatively rapid, inexpensive and accurate. Electronic devices are also available for both low level and high phosphine gas readings. Such devices should be used in full compliance with manufacturers' recommendations.

13. NOTIFICATION REQUIREMENTS

13.1 **Authorities and on-site workers:**

As required by local regulations, notify the appropriate local officials (fire department, police department, etc.) of the impending fumigation. Provide to the officials an MSDS and an Applicator's Manual for the product and any other technical information deemed useful. Offer to review this information with the local official(s).

13.2 **Incidents involving these products:**

Registrants must be informed of any incident involving the use of this product. Please call (540) 234-9281/1-800-330-2525 so Degesch American can report the incident as per requirements of 40 CFR Part 159.

13.3 **Theft of products:**

Immediately report to the local police department thefts of metal phosphide fumigants.

14. APPLICATOR AND WORKER EXPOSURE

14.1 **Phosphine gas Exposure Limits**

Exposures to phosphine must not exceed the 8-hour Time Weighted Average (TWA) of 0.3 ppm or the 15-minute Short-Term Exposure Limit (STEL) of 1.0 ppm phosphine. All persons are covered by these exposure standards.

14.2 **Application of Fumigant**

At least two persons, a certified applicator and trained person, or two trained persons under the direct supervision of the certified applicator must be present when entry into a structure for application of the fumigant is required. Depending upon temperature and humidity, Degesch Magtoxin Spot Fumigant releases phosphine gas slowly upon exposure to moisture from the air. This release rate is considerably more rapid than with PHOSTOXIN. If the fumigator's exposure exceeds the allowable exposure limit approved respiratory protection must be worn. It is often advisable to wear respiratory protection during application of fumigant under hot and humid conditions, particularly when considerable time must be spent in preparation of the Magtoxin Prepac for application.

14.3 **Leakage from Fumigated Sites**

Phosphine gas is highly mobile and given enough time may penetrate seemingly gas-tight materials such as concrete and cinder block and may escape from sealed or partially sealed equipment. This is generally of no consequence if the tank or bin is out of doors. However, leakage into rooms housing treated machinery, equipment, transfer lines, etc., may result in phosphine gas levels above 0.3 ppm. Doors leading to work areas housing treated equipment must be placarded, and entry prior to aeration prohibited, unless approved respiratory protection is worn or gas levels less than 0.3 ppm have been measured. Adjacent, enclosed areas likely to be occupied must be examined to ensure that significant leakage has not occurred. Sealing of the fumigated site and/or airflow in the occupied areas must be sufficient to meet exposure standards.

14.4 **Aeration and Reentry**

Treated machinery and equipment and work areas housing this equipment must be aerated

after spot fumigation until the level of phosphine gas is 0.3 ppm or below. Aeration of equipment is generally complete in one hour. Significant quantities of commodity in treated tanks or bins must be monitored to ensure that liberation of gas from the treated commodity does not result in the development of unacceptable levels of phosphine gas. Do not allow entry into areas housing equipment that has been treated by any person before the level of phosphine reaches 0.3 ppm or below unless protected by an approved respirator.

14.5 Handling Unaerated Commodities

Transfer and processing of incompletely aerated commodity is permissible. A Certified Applicator is responsible for training workers who handle the transfer of incompletely aerated listed commodities, and appropriate measures must be taken (i.e., ventilation or respiratory protection) to prevent exposures from exceeding the exposure limits for phosphine. The new storage structure must be placarded if it contains more than 0.3 ppm phosphine. If the fumigated structure must be entered to complete the transfer, at least two trained persons, wearing proper respiratory protection, may enter the structure. A certified applicator must be physically present during the entry into the structure. REMEMBER transporting containers or vehicles under fumigation over public roads is prohibited.

14.6 Industrial Hygiene Monitoring

Phosphine exposures must be documented in an operations log or manual at each fumigation area and operation where exposures may occur. Monitor airborne phosphine concentrations in all indoor areas to which fumigators and other workers have had access during fumigation and aeration. Perform such monitoring in workers' breathing zones. This monitoring is mandatory and is performed to determine when and where respiratory protection is required. Once exposures have been adequately characterized spot checks must be made, especially if conditions change significantly, if an unexpected garlic odor is detected, or a change in phosphine level is suspected.

14.7 Engineering controls and work practices

If monitoring shows that workers may be exposed to concentrations in excess of the permitted limits, then engineering controls (such as forced air ventilation) and/or appropriate work practices (such as windows in rooms housing equipment kept open or a fan or hood area may be employed) must be used to reduce exposure to within permitted limits. In any case, appropriate respiratory protection must be worn if phosphine exposure limits are exceeded.

15. PLACARDING OF FUMIGATED AREAS

All entrances into a structure where equipment is being fumigated must be placarded. Placards must be made of substantial material that can be expected to withstand adverse weather conditions and must bear the wording as follows:

1. The signal word DANGER/PELIGRO and the SKULL AND CROSSBONES symbol in red.
2. The statement "Structure, equipment and/or commodity under fumigation, DO NOT ENTER/NO ENTRE".
3. The statement, "This sign may only be removed by a certified applicator or a person with documented training after the equipment/commodity is completely aerated (contains 0.3 ppm or less of phosphine gas). If incompletely aerated commodity is transferred to a new storage structure, the new structure must also be placarded if it contains more than 0.3 ppm. Workers exposure during this transfer must not exceed allowable limits.
4. The date the fumigation begins.
5. Name and EPA registration number of fumigant used.
6. Name, address and telephone number of the Fumigation Company and/or applicator.
7. A 24-hour emergency response telephone number.

All entrances into a fumigated structure must be placarded. Where possible, placards should be placed in advance of the fumigation to keep unauthorized persons away.

Do not remove placards until the treated equipment and/or commodity is aerated down to 0.3 ppm phosphine or less. To determine whether aeration is complete, each fumigated structure must be monitored and shown to contain 0.3 ppm or less phosphine gas in the

air space around and, if feasible, in the mass of the commodity.

16. **SEALING OF EQUIPMENT**

The equipment to be fumigated must first be inspected to determine if it can be made sufficiently gas tight. Careful sealing is required so that adequate gas levels are retained. Eliminate drafts inside the equipment by closing off sections which have openings. Take any other steps to prevent air movement inside the equipment, which could negatively affect the fumigation. Seal all openings with tape, tarping, etc., to prevent escape of phosphine gas into rooms housing the equipment. Sites to be fumigated must be tightly sealed. If possible, recommend for the permanent installation of fumiports inside the equipment so as to eliminate the possibility of contamination and the requirement for immediate recovery of the applied dose prior to restart.

Thoroughly inspect the structure to be fumigated and seal cracks, holes and openings. These areas could include, but are not limited to: windows, doors, vents, chimneys, open pipes and structural flaws. Sealing techniques can vary, but most often include polyethylene sheeting, adhesive tapes and adhesive sprays. Expandable foam or caulking material can work well on structural flaws. Proper sealing will insure sufficient gas levels within the fumigated area and will decrease the chance of unwanted exposures outside of the fumigated area.

DO NOT FUMIGATE EQUIPMENT AND/OR A STRUCTURE THAT CANNOT BE SEALED SUFFICIENTLY GAS TIGHT.

17. **AERATION OF FUMIGATED COMMODITIES**

As an alternative to the aeration time periods listed below each container of the treated commodity may be analyzed for residues using accepted analytical methods.

15.1 Foods and feeds

Tolerances for phosphine residues have been established at 0.1 ppm for animal feeds and 0.01 ppm for processed foods. To guarantee compliance with these tolerances, it is necessary to aerate these commodities for a minimum of 48 hours prior to offering them to the end consumer.

15.2 Non-food commodities

Aerate all non-food commodities to 0.3 ppm or less of phosphine. Monitor densely packed commodities to ensure that aeration is complete.

15.3 Tobacco

Tobacco must be aerated for at least three days (72 hours) when fumigated in hogsheads and for at least two days (48 hours) when fumigated in other containers or until concentration is below 0.3 ppm. When plastic liners are used, longer aeration periods will probably be required to aerate the commodity down to 0.3 ppm.

18. **STORAGE INSTRUCTIONS**

DEGESCH Magtoxin Prepac Spot Fumigant must be stored in a dry, well-ventilated area away from heat, under lock and key. Maintain temperature below 130°F. Post as a pesticide storage area.

Do not contaminate water, food or feed by storing pesticides in the same areas used to store these commodities. Do not store in buildings where humans or domestic animals reside. Keep out of reach of children.

18.1 **Labeling of Storage**

The labeling of the storage area should take into account the needs of a variety of organizations. These include, but are not limited to: company policy, insurance carrier, Occupational Safety and Health Administration (OSHA), Right to Know and local emergency response professionals. At a minimum, the storage must be marked with the following signs and should be locked:

1. Danger, Poison (with skull and cross bones)
2. Authorized Personnel Only
3. National Fire Protection Association (NFPA) Hazard Identification Symbols for the pesticide.

The NFPA has developed Hazard Identification Symbols. This standardized system is designed to provide, at a glance the information regarding the health, fire and reactivity hazards associated with hazardous materials. The following are the hazard categories and degree of hazard for aluminum phosphide:

Category	Degree of Hazard
Health	4 (Severe Hazard)
Flammability	4 (Sever Hazard)
Reactivity	2 (Moderate)
Special Notice Key	W

NOTE: When using the NFPA Hazard Identification System, the characteristics of all hazardous materials stored in a particular area must be considered. The local fire protection district should be consulted for guidance on the selection and placement of such signs.

19. TRANSPORTATION INSTRUCTIONS

The United States Department of Transportation (DOT) classifies magnesium phosphide as Dangerous When Wet material and it must be transported in accordance with DOT regulations.

19.1 **TRANSPORT DESIGNATIONS** - The following transport designations apply to magnesium phosphide.

Proper Shipping Name: magnesium phosphide
Hazard Class: 4.3
Identification No.: UN 2011
Packing Group: PG I
Shipping Label: Dangerous When Wet/Poison
Shipping Placards: Dangerous When Wet

19.2 Transportation exemption:

Exemption: DOT-E11329
Purpose and Limitation: "...The motor vehicles used under the terms of this exemption are not require to be placarded..."
Modes of Transportation Authorized: Motor vehicle (Only private motor vehicles used in pest control operations are authorized to transport the packages covered by the terms of this exemption.)

NOTE: You must have a copy of this exemption with you during transportation. For a copy of this exemption contact:

DEGESCH AMERICA, INC.
153 Triangle Drive
P.O. Box 116
Weyers Cave, VA 24486
Telephone: (540) 234-9281/1-800-330-2525
Internet: www.degeschamerica.com

20. FUMIGATION MANAGEMENT PLAN

The certified applicator is responsible for working with the owners and/or responsible employees of the structure, equipment and/or area to be fumigated to develop a Fumigation Management Plan (FMP). The FMP is intended to ensure a safe and effective fumigation. The FMP must address characterization of the structure, equipment and/or area, and include appropriate monitoring and notification requirements, consistent with, but not limited to, the following:

1. Inspect the structure, equipment and/or area to determine its suitability for fumigation.
2. When sealing is required, consult previous records for any changes to

the structure and equipment, seal leaks, and monitor any occupied adjacent buildings to ensure safety.

3. Prior to each fumigation, review any existing FMP, MSDS, Applicators Manual and other relevant safety procedures with company officials and appropriate employees.
4. Consult company officials in the development of procedures and appropriate safety measures for nearby workers that will be in and around the area during application and aeration.
5. Consult with company officials to develop an appropriate monitoring plan that will confirm that nearby workers and bystanders are not exposed to levels above the allowed limits during application, fumigation and aeration. This plan must also demonstrate that nearby residents will not be exposed to concentrations above the allowable limits.
6. Consult with company officials to develop procedures for local authorities to notify nearby residents in the event of an emergency.
7. Confirm the placement of placards to secure entrance into any structure where equipment is under fumigation.
8. Confirm the required safety equipment is in place and the necessary manpower is available to complete a safe and effective fumigation.
9. Degesch Magtoxin Prepac Spot Fumigant may not be applied directly to railcars, containers or other transport vehicles for in transit fumigation.

These factors **must** be considered in putting a FMP together. It is important to note that some plans will be more comprehensive than others. All plans should reflect the experience and expertise of the applicator and circumstances at and around the structure, equipment and/or area.

In addition to the plan, the applicator must read the entire label and applicator manual and follow its directions carefully. If the applicator has any questions about the development of a FMP contact Degesch America, Inc. for further assistance.

The FMP and related documentation, including monitoring records, must be maintained for a minimum of 2 years.

GUIDANCE FOR PREPARATION OF A FUMIGATION MANAGEMENT PLAN.

Purpose

A Fumigation Management Plan (FMP) is an organized, written description of the required steps involved to help ensure a safe, legal and effective fumigation. It will also assist you and others in complying with pesticide product label requirements. The guidance that follows is designed to help assist you in addressing all the necessary factors involved in preparing for and fumigating equipment and/or structures with Degesch Magtoxin Prepac Spot Fumigant.

This guidance is intended to help you organize any fumigation that you might perform **PRIOR TO ACTUAL TREATMENT**. It is meant to be somewhat prescriptive, yet flexible enough to allow the experience and expertise of the fumigator to make changes based on circumstance, which may exist in the field. By following a step-by-step procedure, yet allowing for flexibility, safe and effective fumigation can be performed.

Before any fumigation begins, carefully read and review the label and the Applicator's Manual. This information must also be given to the appropriate company officials (supervisors, foreman, safety officer, etc.) in charge of the site. Preparation is the key to any successful fumigation. If you do not find specific instructions for the type of fumigation that you are to perform listed in this Guidance Document you will want to construct a similar set of procedures using this document as your guide or contact Degesch America, Inc. for assistance. The success of the fumigation is not only dependent on your

ability to do your job but also upon carefully following all rules, regulations, and procedures required by governmental agencies.

A CHECKLIST GUIDE FOR A FUMIGATION MANAGEMENT PLAN

This checklist is provided to help you take into account factors that must be addressed prior to performing all fumigations. It emphasizes safety steps to protect people and property. The checklist is general in nature and cannot be expected to apply to all types of fumigation situations. It is to be used as a guide to prepare the required plan. Each item must be considered. However, it is understood that each fumigation is different and not all items will be necessary for each fumigation site.

A. PRELIMINARY PLANNING AND PREPARATION

1. Determine the purpose of the fumigation.
 - a. Elimination of insect infestation
 - b. Elimination of vertebrate pests
 - c. Plant pest quarantine.

2. Determine the type of fumigation, for example
 - a. Food and Feed Processing Machinery and Equipment
 - b. Mills and Roll Stands
 - c. Shaker Boxes and Sifters
 - d. Purifiers
 - e. Hoppers and Bins
 - f. Air Filters

3. Fully acquaint yourself with the structure and equipment to be fumigated, including.
 - a. The general structure layout, construction (materials, design, age, maintenance), of the structure fire or combustibility hazards, connecting structures and escape routes, above and below ground, and other unique hazards or structural characteristics. Prepare; with the owner/operator/person in charge a drawing or sketch of equipment to be fumigated, delineating features, hazards, and other structural characteristics.
 - b. The number and identification of persons who routinely enter the area to be fumigated (i.e. Employees, visitors, customers, etc.)
 - c. The specific equipment to be fumigated and its condition.
 - d. The previous treatment history of the equipment, if available.
 - e. Accessibility of utility service connections.
 - f. Nearest telephone or other means of communication. Mark the location of these items on the drawing/sketch.
 - g. Emergency shut-off stations for electricity water and gas. Mark the location of these items on the drawing/sketch.
 - h. Current emergency telephone numbers of local Health, Fire, Police, Hospital and Physician responders.
 - i. Name and phone number (both day and night) of appropriate company officials.
 - j. Check, mark and prepare the points of fumigation application to facilitate accounting during application of the fumigant and its recovery after exposure and aeration.
 - k. Review labeling and Applicator's Manual.
 - l. Exposure time considerations.
 1. Fumigant to be used.
 2. Minimum fumigation period, as defined and described by the label use directions.
 3. Down time required to be available
 4. Aeration requirements
 5. Cleanup requirements, including dry or wet deactivation methods, equipment, and personnel needs, if necessary.
 6. Measured and recorded commodity temperature and moisture.
 - m. Determination of dosage
 1. Cubic footage or other appropriate space/location calculations.

- 2. Structure sealing capability and methods.
- 3. Label recommendations
- 4. Temperature, humidity, wind
- 5. Commodity/space volume
- 6. Past history of fumigation of the equipment
- 7. Exposure time.

B. PERSONNEL

- 1. Confirm in writing that all personnel in and around the structure and/or area to be fumigated have been notified prior to application of the fumigant. Consider using a checklist each one initials indicating they have been notified.
- 2. Instruct all fumigation personnel to read the Applicator's Manual concerning the hazards that may be encountered, the selection of personal protection devices, including detection equipment.
- 3. Confirm that all personnel are aware of and know how to proceed in case of an emergency situation.
- 4. Instruct all personnel on how to report any accident and/or incidents related to fumigant exposure. Provide a telephone number for emergency response reporting.
- 5. Instruct all personnel to report to proper authorities any theft of fumigant and/or equipment related to fumigation.
- 6. Establish a meeting area for all personnel in case of emergency.

C. MONITORING

1. Safety

- a. Monitoring phosphine conditions must be conducted in areas to prevent excessive exposure and to determine where exposure may occur. Document where monitoring will occur.
- b. Keep a log or manual of monitoring records for each application point and/or area. This log must at a minimum contain the timing, number of readings taken and level of concentrations found in each location.
- c. When monitoring, document even if there is no phosphine present above the safe levels. In such cases, subsequent monitoring is not routinely required. However spot checks must be made occasionally, especially if conditions significantly change.
- d. Monitoring must be conducted during aeration and corrective action taken if gas levels exceed the allowed levels in an area where bystanders and/or nearby residents or domestic animals may be exposed.

2. Efficacy

- a. Phosphine gas readings should be taken from within the fumigated structure to insure proper gas concentrations. If the phosphine levels have fallen below the targeted level the fumigators, following proper entry procedures may reenter the structure and add additional product.
- b. All phosphine readings should be documented.

D. NOTIFICATION

- 1. Confirm the appropriate local authorities (fire departments, police departments, etc.) have been notified as per label instructions, local ordinances, or instructions of the client.
- 2. Prepare written procedure ("Emergency Response Plan"), which contains explicit instructions, names, and telephone numbers so as to be able to notify local authorities if phosphine levels are exceeded in an area that could be dangerous to bystanders and or domestic animals.

E. SEALING PROCEDURES

1. Sealing must be adequate to control the pests. Care should be taken to insure that sealing materials would remain intact until the fumigation is complete.
2. If the equipment or structure has been fumigated before, review the previous FMP for previous sealing information.
3. Make sure that construction/remodeling has not changed the equipment or structure in a manner that will effect the fumigation.
4. Warning placards must be placed on every possible entrance to the structure housing the equipment.

F. APPLICATION PROCEDURES & FUMIGATION PERIOD

1. Plan carefully and apply all fumigants in accordance with the label requirements.
2. When entering into the area under fumigation always work with two or more people under the direct supervision of a certified applicator wearing appropriate respirators.
3. Apply fumigant from the outside where appropriate.
4. Recommend for the permanent installation of fumiports inside the equipment so as to eliminate the possibility of contamination and the requirement for immediate recovery of the applied dose prior to restart.
5. Provide watchmen when the possibility of entry into the fumigation site by unauthorized persons cannot otherwise be assured.
6. When entering structures always follow OSHA rules for confined spaces.
7. Turn off any electric lights in the fumigated area of the structure as well as all nonessential electrical motors.

G. POST-APPLICATION OPERATIONS

1. Provide watchmen when the fumigation structure cannot be secured from entry by unauthorized persons during the aeration process.
2. Aerate in accordance with structural limitations.
3. Turn on ventilating or aerating fans where appropriate.
4. Use a suitable gas detector before reentry into a fumigated structure to determine fumigant concentration.
5. Keep written records of monitoring to document completion of aeration.
6. Consider temperature when aerating.
7. Remove warning placards when aeration is complete.
8. Inform business/client that employees/other persons may return to work or otherwise be allowed to reenter the aerated structure.

21. APPLICATION PROCEDURES

A FMP must be devised for application, aeration and disposal of the fumigant so as to keep to a minimum any exposures to phosphine gas and to help adequate control of the insect pests. The most important aspect in spot fumigation is a thorough understanding of the equipment and all of the various product and air flow patterns. The fumigator should review schematics and/or diagrams of the facility and a walking survey should be conducted to inspect the food processing machinery and equipment.

21.1 The following instructions are intended to provide general guidelines for typical fumigations.

- Spot treat equipment monthly with **Magtoxin** Prepacs or as needed to supplement general fumigations.
- Run machinery to empty the process stream and remove dead stocks where possible prior to application of **Magtoxin** Prepacs.
- Using sharp scissors or similar cutting device, cut the appropriate amount of fumigant from the roll of Prepacs and apply to the equipment.
- Be careful not to cut into the blisters and allow intact pellets or spent dust to fall into the machinery.

- Make sure the Prepacs are flat and are not folded over during application.
- Prominently mark or otherwise indicate the points of application so that the applied dose may be readily located and recovered after aeration.
- Under no conditions should processed food be permitted to come in contact with **Magtoxin** or its spent residual.
- Immediately after application close all doors and windows so as to reduce drafts and air currents in the building during the exposure period.
- Do not allow any portions of the **Magtoxin** Prepac to enter the food processing stream.
- At the end of the fumigation and prior to restarting the machinery, collect all spent or partially spent **Magtoxin** from the treated equipment, unless applications have been made to fumiports or similar devices within the processing equipment which will retain the fumigant blisters.
- Transport this material to an appropriate site for further deactivation and ultimate disposal following recommendations given elsewhere in this Applicator's Manual under "Disposal Instructions".

21.2 Food and Feed Processing Machinery and Equipment

Various pieces of commonly encountered food processing equipment are listed in the following along with comments relating to their successful spot treatment with **Magtoxin** Prepacs.

21.3 Mills and Roll Stands - These are frequently separated front and back, and the dosage should be applied in both sections. Mills and roll stands are generally sufficiently gas tight or can readily be sealed so as to obtain satisfactory results.

21.4 Shaker Boxes and Sifters - Shaker boxes and sifters are generally not gas tight but may be spot treated without further sealing if air currents within the process stream are eliminated. It is recommended that the **Magtoxin** Prepac dose be applied at the bottom.

21.5 Purifiers - Purifiers cannot be successfully spot fumigated unless they are completely sealed. Fogging with an EPA-approved pesticide is recommended in facilities where sealing of the purifiers is not practical or too labor intensive.

21.6 Hoppers and Bins - Hoppers and bins are generally sufficiently gas tight with little or no sealing. Valves and vents should be closed prior to dosing.

22 DISPOSAL INSTRUCTIONS

22.1 General

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

Unreacted or partially reacted **Magtoxin** is acutely hazardous. Improper disposal of excess pesticide 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. For specific instructions, see Section 10 of this manual, Spill and Leak Procedures.

Some local and state waste disposal regulations may vary from the following recommendations. Disposal procedures should be reviewed with appropriate authorities to ensure compliance with local regulations. Contact your State Pesticide or Environmental Control Agency or Hazardous Waste Specialist at the nearest EPA Regional Office for guidance.

Dispose of containers in a sanitary landfill or by other procedures approved by state and local authorities.

If properly exposed during the fumigation period, **Magtoxin** Prepacs will contain virtually no unreacted magnesium phosphide. However, because of the short term of the spot treatment and because these fumigations are sometimes performed under cooler and drier conditions, it is required that all Prepacs be subjected to further deactivation prior to ultimate disposal.

22.2 Directions for Disposal of Exposed Magtoxin Prepacs

Confinement of partially spent **Magtoxin**, as in a closed container or plastic bag, may result in a fire hazard. Phosphine gas may be given off from unreacted magnesium phosphide, and

confinement of the gas may result in a flash. Unreacted or incompletely exposed **Magtoxin** must be further deactivated before disposal at a landfill.

Spent or partially spent **Magtoxin** Prepacs may be collected for disposal in well ventilated containers such as wire baskets (available from DEGESCH America, Inc.) or porous cloth bags of burlap, cotton or other suitable material. **Caution:** Confinement and the danger of a flash may result from over filling the ventilated or porous containers. It is preferable to carry out deactivation at the fumigation site. If this is not possible, the Prepacs may be loaded directly into open vehicles for transportation to the deactivation site. **Caution:** Protect the spent or partially spent Prepacs from contact with water as this might result in a flash. Do not pile the cloth bags together.

22.3 Directions for Deactivation of **Magtoxin** Prepac

Magtoxin Prepac Spot Fumigant must be further deactivated prior to ultimate disposal. This is particularly true in cases of incomplete exposure or following a fumigation which has produced large quantities of partially spent material.

Spent or partially spent **Magtoxin** Prepacs may be deactivated as follows using the "Wet or Dry Method".

Water is used for deactivation of **Magtoxin** Prepacs and other magnesium phosphide fumigants by the "Wet Method". Detergent solution is not required for magnesium phosphide fumigants. Fill a drum or other container to be used for wet deactivation with water to within an inch or two of the top. Do not allow a large headspace above the surface of the water.

Magnesium phosphide will react quite rapidly and very vigorously with liquid water. Therefore, small amounts of partially spent material should be tested initially by immersion in water prior to proceeding with large scale wet deactivation. One or two individual Prepacs should be evaluated first to determine their level of activity.

In a well ventilated area, out of doors, completely submerge in water the entire mass of exposed Prepacs. They may float to the surface and, therefore, it is necessary to hold them under water by use of a suitable weight. **Caution:** Partially spent Prepacs may ignite if they are allowed to float to the surface. Active **Magtoxin** Prepacs should be submerged at least 4 to 6 inches to prevent smoking of the liberated phosphine gas. Prepacs may be placed in wire baskets or porous bags for immersion in water.

Reaction of the magnesium phosphide with water is practically complete within about 15 to 30 minutes. However, **Magtoxin** Prepacs should be totally immersed for at least 6 hours to ensure total hydrolysis. **Caution:** Removal of Prepacs from water before they are largely deactivated may result in a fire. They may be taken to an approved site for disposal. Dispose of the water at a sanitary landfill or other approved site or means. Where permissible, the water may be poured out onto the ground or it may be poured into a storm sewer.

Caution: Wear a NIOSH/MSHA approved full-face gas mask - phosphine gas canister combination if exposed to levels between 0.3 ppm to 15 ppm or a Self Contained Breathing Apparatus (SCBA) if exposure is unknown or above 15 ppm during wet deactivation of partially spent material. Do not cover the container being used for wet deactivation. Do not dispose of dust in a toilet.

Partially Spent **Magtoxin** Prepacs may be Deactivated as Follows Using the "Dry Method".

Extension of the fumigation period is the simplest method for further deactivation of partially spent **Magtoxin** prior to ultimate disposal.

Alternatively, exposed materials may be further deactivated by storing the Prepacs out of doors, protected from rain and ground water, in locked wire baskets or other similarly ventilated containers. As time permits, or when the container is full, the deactivated **Magtoxin** Prepacs may be taken to an approved site for disposal. Storage of partially spent Prepacs in a closed container may result in a fire hazard. Large numbers of partially spent Prepacs stored in open containers may ignite if contacted by liquid water.

23 SPILL AND LEAK PROCEDURES

23.1 General Precautions and Directions

A spill, other than incidental to application or normal handling, may produce high levels of gas and, therefore, attending personnel must wear SCBA or its equivalent when the concentration of phosphine gas is unknown. Other NIOSH/MSHA approved respiratory protection may be worn if the concentration is known. Do not use water at any time to clean up a spill of **Magtoxin**. Water in contact with unreacted metal phosphide will greatly accelerate the production of phosphine gas, which could result in a toxic and/or fire hazard. Wear gloves of cotton or other material when handling metal phosphide.

Return all intact aluminum foil pouches of **Magtoxin** Prepacs to original pails or other packaging, which has been suitably constructed and marked according to DOT regulations. Notify consignee and shipper of damaged pails.

If the foil pouches have been punctured or damaged so as to leak, they may be temporarily repaired with aluminum tape. Transport the damaged pouches, thus sealed, to an area suitable for pesticide storage for inspection. **Caution:** The punctured pouches may flash upon opening at some later time. Further instructions and recommendations may be obtained, if required, from DEGESCH America, Inc.

If foil pouches of **Magtoxin** Prepacs have been damaged so severely that they cannot be temporarily repaired, these materials may be wet deactivated on site using the procedure described in 10.2. If on-site, wet deactivation is not feasible, the damaged containers should be transported in open vehicles to a suitable area. Wet deactivation may then be carried out as described in _____. Alternatively, spillage may be spread out in an open area away from inhabited buildings to be deactivated by atmospheric moisture. Care should be taken to ensure that the Prepacs are not carried away by the wind. If desired, they may be weighted down by several inches of sand or soil or by other suitable means. Do not use this procedure during periods of rain or if the soil is wet. After deactivation, the spent **Magtoxin** Prepacs may be gathered for disposal at approved sites.

23.2 Directions for Deactivation by the Wet Method

If the contaminated material is not to be held until completely reacted by exposure to atmospheric moisture, deactivate the product by the "Wet Method" as follows:

Caution: If worker protection standards will be exceeded during wet deactivation of unexposed or incompletely exposed Prepacs, NIOSH/MSHA approved respiratory protection must be worn. Wear a full-face gas mask - phosphine gas canister combination if exposed to levels between 0.3 ppm to 15 ppm or a Self-Contained Breathing Apparatus (SCBA) if exposure is unknown or above 15 ppm. Never place metal phosphide products or their dust in a closed container such as a dumpster, sealed drum, plastic bag, etc., as flammable concentrations and a flash of phosphine gas are likely to develop. Do not cover the deactivation vessel at any time. Do not dispose of **Magtoxin** dust in a toilet.

Water is used for the wet deactivation of **Magtoxin** Prepacs and other magnesium phosphide fumigants. Detergent solution is **not** required. Fill several drums or other containers to be used for wet deactivation with water to within an inch of the top. Do **not** allow a large headspace above the surface of the water.

Magnesium phosphide reacts very vigorously with water and, therefore, only 1 or 2 unexposed **Magtoxin** Prepacs should be wet deactivated at one time. Cut individual Prepacs from the roll. Never attempt deactivation of an entire roll. Unexposed Prepacs will likely ignite if they are allowed to float to the surface of the water. They may be placed into wire baskets or similar containers, weighted and dropped into the water for deactivation. The Prepacs should be submerged to at least 4 to 6 inches to prevent smoking of the liberated phosphine gas.

Reaction of magnesium phosphide with water is practically complete within about 15 to 30 minutes. However, the **Magtoxin** Prepacs should be totally immersed for at least 6 hours to ensure total hydrolysis. It is suggested that one or more drums or barrels be set up for the first half hour's immersion, until bubbling has practically ceased, after which the Prepacs are transferred to a second drum for the remainder of the wet deactivation period. **Caution:** Removal of **Magtoxin** Prepacs from water before they are largely deactivated may result in fire. Deactivated Prepacs may then be taken to an approved site for disposal. Dispose of the water at a sanitary landfill or other approved site or means. Where permissible, the water may be poured out onto the ground or it may be poured into a storm sewer.

The EPA has determined that proper disposal of magnesium phosphide will cause no unreasonable adverse effects to the environment.

FOR ASSISTANCE, CONTACT:

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P. O. Box 116
Weyers Cave, Virginia 24486 USA
Telephone: (540) 234-9281
Fax: (540) 234-8225

or

CHEMTREC (800) 424-9300

~~May 20, 2003 Bjl/DAI~~
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