

72959-9

1/6/2000

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**RESTRICTED USE PESTICIDE**  
**DUE TO ACUTE INHALATION TOXICITY OF**  
**HIGHLY TOXIC HYDROGEN PHOSPHIDE**  
**(PHOSPHINE, PH<sub>3</sub>) GAS**

For retail sale to and use only by certified applicators for those uses covered by the applicator's certification or persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of the certified applicator. Physical presence means on site or on the premises. Read and follow the label and the DEGESCH America, Inc., Applicator's Manual which contains complete instructions for the safe use of this pesticide.

**APPLICATOR'S MANUAL**

for

**ACCEPTED**  
**JAN 6 2000**  
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 72959-9



**TABLET PREPAC**

Patent No. 4653644

**FOR USE AGAINST INSECTS WHICH INFEST STORED COMMODITIES**

Active Ingredient: Aluminum Phosphide .....55%  
 Other Ingredients .....45%

**KEEP OUT OF REACH OF CHILDREN**



**DANGER - POISON - PELIGRO**



**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.)

**STATEMENT OF PRACTICAL TREATMENT**

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 the gas or dust from aluminum phosphide is inhaled:**

Get exposed person to fresh air. Keep warm and make sure person can breathe freely. If breathing has stopped, give artificial respiration by mouth-to-mouth or other means of resuscitation. Do not give anything by mouth to an unconscious person.

**If aluminum phosphide pellets, tablets or powder are swallowed:**

Drink or administer one or two glasses of water and induce vomiting by touching back of throat with finger, or if available, syrup of ipecac. Do not give anything by mouth if victim is unconscious or not alert.

**If powder or granules of aluminum phosphide get 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 dust from pellets or tablets gets in eyes:**

Flush with plenty of water. Get medical attention.

**DEGESCH AMERICA, INC.**

Weyers Cave, Virginia 24486 USA • Telephone (540) 234-9281

EPA Est. No. 40285-VA-01

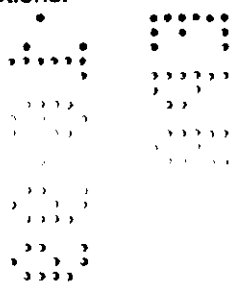
EPA Reg. No. 40285-14

THIS PRODUCT IS ACCOMPANIED BY AN APPROVED LABEL AND APPLICATOR'S MANUAL. READ AND UNDERSTAND THE ENTIRE LABELING. ALL PARTS OF THE LABELING ARE EQUALLY IMPORTANT FOR SAFE AND EFFECTIVE USE OF THIS PRODUCT. CALL DEGESCH AMERICA, INC., OR EPA IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABELING.

REFER TO THE APPLICATOR'S MANUAL FOR DETAILED PRECAUTIONS, RECOMMENDATIONS AND DIRECTIONS FOR USE.

**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.



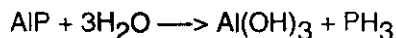
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## 1. INTRODUCTION

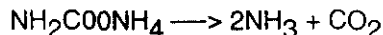
**Phostoxin** fumigants are used to protect stored commodities from damage by insects and for the control of burrowing pests. Fumigation of stored products with **Phostoxin** in the manner prescribed in the labeling does not contaminate the marketed commodity.

**Phostoxin** and other DEGESCH metal phosphide fumigants are acted upon by atmospheric moisture to produce hydrogen phosphide (phosphine, PH<sub>3</sub>) gas. **Phostoxin** tablets and pellets contain aluminum phosphide (AlP) as their active ingredient and will liberate hydrogen phosphide via the following chemical reaction:



Hydrogen phosphide gas is highly toxic to insects, burrowing 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 the DEGESCH **Phostoxin** Tablet Prepac.

**Phostoxin** 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 **Phostoxin** Tablet Prepac consists of a gas-permeable polymeric material containing **Phostoxin** Tablets-R. Each Tablet Prepac strip is roughly 4 in. x 14 in. and contains 33 of the round tablets. **Phostoxin** Tablets-R weigh approximately 3 grams each and release 1 gram of hydrogen phosphide gas. Each Tablet Prepac will liberate 33 grams of hydrogen phosphide. The Prepac strips are sealed into gas-tight aluminum foil pouches which are then packed into covered metal pails. The pails are constructed to conform to UN Performance Oriented Packaging Standards.

Upon opening the aluminum foil pouch, atmospheric moisture penetrates the porous fleece material on the top and bottom of the **Phostoxin** Tablet Prepac. The **Phostoxin** tablets then begin to react to produce small quantities of hydrogen phosphide gas which diffuses out through the fleece into the surrounding space. This reaction starts slowly, gradually accelerates and then tapers off as the aluminum phosphide is spent. The rate of decomposition of the Tablet Prepac will vary depending upon moisture and temperature conditions. For example, when moisture and temperature are high, decomposition of **Phostoxin** may be complete in less than 3 days. However, at lower ambient temperatures and relative humidity levels, decomposition of **Phostoxin** may require 5 days or more. After decomposition, **Phostoxin** leaves a gray-white powder composed almost entirely of aluminum hydroxide and other approved inert ingredients. This powder will be retained inside the fleece of the Prepac strip and may be retrieved after the fumigation so as not to contaminate the treated commodity. If properly exposed, the spent **Phostoxin** Prepac will normally contain only a small amount of unreacted aluminum phosphide and may be disposed of without hazard. This is not considered a hazardous waste. However, partially spent residual from incompletely exposed **Phostoxin** Prepacs will require special care. Precautions and instructions for further deactivation and disposal will be given later in this Manual.

**Phostoxin** Tablet 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 Applicators Manual.

A summary of safety recommendations is outlined on the next page:

### SAFETY RECOMMENDATIONS SUMMARY

1. Carefully read the labeling and follow instructions explicitly.
2. Never fumigate alone from inside structures.
3. Person supervising must be a certified fumigator and personnel assisting must be trained in the use of **Phostoxin**. Never allow uninstructed personnel to handle **Phostoxin**.
4. Approved respiratory protection must be available for the fumigation of structures from within.
5. It is not necessary to wear gloves or other protective clothing when handling **Phostoxin** Prepacs. However, wear dry gloves of cotton or other material if contact with **Phostoxin** tablets, pellets or dust is likely. Wash hands thoroughly after using **Phostoxin**
6. Never open fumigant containers in a flammable atmosphere. It is preferable to open them in open air, near a fan or other appropriate ventilation which will rapidly exhaust contaminated air. Containers may be opened inside the structure to be fumigated provided worker's exposure to hydrogen phosphide gas does not exceed allowable limits.
7. Do not allow **Phostoxin** to contact liquid water or to pile up.
8. Dispose of empty containers and spent Prepacs in a proper manner consistent with the label instructions.
9. Post warning placards on fumigated areas.
10. Prior to fumigation, notify appropriate company employees. Provide to local officials (fire department, rescue squad, police, etc.) on an annual basis relevant safety information for use in the event of an emergency.
11. Hydrogen phosphide fumigants are **not** to be used for vacuum fumigations.
12. Exposures to hydrogen phosphide must not exceed the eight hour TWA of 0.3 ppm during application, or a ceiling concentration of 0.3 ppm after application is completed.
13. Fumigated areas must be aerated to 0.3 ppm hydrogen phosphide or less prior to reentry by unprotected workers.
14. Finished foods and feeds which have been fumigated with **Phostoxin** must be aerated for 48 hours prior to offering to the end consumer.
15. Transfer of a treated commodity to another site without complete aeration is permissible provided that the new storage site is placarded if its concentration is above 0.3 ppm.
16. Keep containers of **Phostoxin** tightly closed except while removing product for application.
17. Protect materials containing metals such as copper, silver, gold and their alloys and salts from corrosive exposure to hydrogen phosphide.
18. **Phostoxin** Prepacs may be used for the fumigation of packaged goods, processed foods and other commodities where direct contact with **Phostoxin** or its reacted residue is illegal or not desired.
19. Do not use aluminum phosphide containers for any purpose other than recycling or reconditioning.
20. OSHA recommends preexposure screening of employees to detect impaired pulmonary function. They recommend that any employees developing this condition be referred for medical examination.

## 2. PRECAUTIONARY STATEMENTS

### 2.1 Hazards to Humans and Domestic Animals

DANGER: Aluminum phosphide from DEGESCH **Phostoxin** or its partially spent dust may be fatal if swallowed. Do not get in eyes, on skin or on clothing. Do not eat, drink or smoke while handling aluminum phosphide fumigants. If a sealed container is opened, or if the material comes into contact with moisture, water or acids, these products will release hydrogen phosphide (phosphine, PH<sub>3</sub>) which is an extremely toxic gas. If a garlic odor is detected, refer to the Industrial Hygiene Monitoring Section

on Page 14 of 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.

**2.2 Statement of Practical Treatment**

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 the gas or dust from aluminum phosphide is inhaled:**

Get exposed person to fresh air. Keep warm and make sure person can breathe freely. If breathing has stopped, give artificial respiration by mouth-to-mouth or other means of resuscitation. Do not give anything by mouth to an unconscious person.

**If aluminum phosphide pellets, tablets or powder are swallowed:**

Drink or administer one or two glasses of water and induce vomiting by touching back of throat with finger, or if available, syrup of ipecac. Do not give anything by mouth if victim is unconscious or not alert.

**If powder or granules of aluminum phosphide get 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 dust from pellets or tablets gets in eyes:**

Flush with plenty of water. Get medical attention.

**2.3 Note to Physician** (we recommend that this section be given to the attending physician)

Aluminum phosphide tablets, pellets or dust reacts with moisture from the air, acids and many other liquids to release hydrogen phosphide (phosphine, PH<sub>3</sub>) gas. Mild exposure by inhalation 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 judgement:

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.

2.4 Physical and Chemical Hazards

Aluminum phosphide in Phostoxin Tablet Prepacs and partially spent materials will release hydrogen phosphide if exposed to moisture from the air or if it comes into contact with water, acids and many other liquids. 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. Ignition of high concentrations of hydrogen phosphide can produce a very energetic reaction. Explosions can occur under these conditions and may cause severe personal injury. Never allow the buildup of hydrogen phosphide to exceed explosive concentrations. Do not confine spent or partially spent metal phosphide fumigants as the slow release of hydrogen phosphide from this material may result in formation of an explosive atmosphere. Aluminum 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 aluminum 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 these containers in a flammable atmosphere. These precautions will also reduce the fumigator's exposure to hydrogen phosphide gas. Containers may be opened inside the structure to be fumigated provided worker's exposure to hydrogen phosphide gas does not exceed allowable limits.

Pure phosphine (hydrogen phosphide) 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, fork lifts, temperature monitoring systems, switching gears, communication devices, computers, calculators and other electrical equipment should be protected or removed before fumigation. Hydrogen phosphide will also react with certain metallic salts and, therefore, sensitive items such as photographic film, some inorganic pigments, etc., should not be exposed.

3. DIRECTIONS FOR USE

3.1 General

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. 3.1.1 DEGESCH Phostoxin Tablet Prepac is a Restricted Use Pesticide due to the acute inhalation toxicity of hydrogen phosphide (phosphine, PH<sub>3</sub>) gas. This product is for retail sale to and use only by certified applicators for those uses covered by the applicator's certification or persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of the certified applicator. Physical presence means on site or on the premises. Read and follow the label and the DEGESCH America, Inc., Applicator's Manual which contains complete instructions for the safe use of this pesticide.

- 3.1.2 Phostoxin is a highly hazardous material and should be used only by individuals trained in its proper use. Before using, read and follow all label precautions and directions.

Additional copies of this Manual are available from:

DEGESCH America, Inc.  
P. O. Box 116  
Weyers Cave, VA 24486  
(540) 234-9281  
Internet address: <http://www.degeschamerica.com>

Persons working with **Phostoxin** should be knowledgeable of the hazards of this chemical and trained in the use of required respiratory equipment and detector devices, emergency procedures, and use of the fumigant.

- 3.1.3 At least two persons trained in the use of **Phostoxin** must be present during fumigation of structures if entry into the structure is required for application of the fumigant. Two trained persons must also be present during reentry into fumigated or partially aerated structures. Only one trained person is required to be present when **Phostoxin** is applied from outside the area to be treated.
- 3.1.4 Shipholds, barges, containers on ships, railroad cars and containers shipped piggyback by rail may be fumigated intransit. However, trucks, vans, trailers and similar transport vehicles cannot be moved over public roads or highways until they are aerated and the warning placards removed.
- 3.1.5 Do not fumigate commodities with **Phostoxin** when commodity temperature is below 40°F (5°C).
- 3.1.6 The site to be fumigated must first be inspected to determine if it can be made sufficiently gas tight. Then a plan should be developed to provide for safe and efficient application of the fumigant to include emergency procedures, etc., where required, and to decide how monitoring should be conducted to prevent excessive exposures.
- 3.1.7 It is not necessary to wear gloves or other protective clothing when handling **Phostoxin** Prepac. However, wear dry gloves of cotton or other material while handling **Phostoxin** tablets and pellets. Wash hands thoroughly after use.
- 3.1.8 **Phostoxin** Prepac must be removed for disposal at the end of the fumigation period.
- 3.1.9 Although both sides of the Tablet Prepac are porous, it is recommended that they be applied so that the printed side can be seen. The Prepac provides for maximum access of air to the **Phostoxin** tablets. The Tablet Prepac may also be probed below the surface of bulk feed or raw agricultural commodity if they are carefully secured and marked for easy retrieval after the exposure period.
- 3.1.10 Hydrogen phosphide gas may flash at concentrations above its flammable limit. Therefore, never open **Phostoxin** containers in a flammable atmosphere. It is preferable to open them in open air, near a fan or other appropriate ventilation which will rapidly exhaust contaminated air. These precautions will also reduce the applicator's exposure to hydrogen phosphide gas. Containers may be opened inside the structures to be fumigated provided worker's exposure to hydrogen phosphide gas does not exceed allowable limits.
- 3.1.11 Piling of **Phostoxin** Prepac or addition of liquid water may speed up the reaction, cause a temperature increase and confine the gas so that ignition could occur.
- 3.1.12 Aluminum foil pouches in which the Tablet Prepac are packed are not resealable and may not be returned to storage after they have been opened. Once a pouch has been opened its entire contents must be used or deactivated for disposal.
- 3.1.13 Hydrogen phosphide gas may react with certain metals and their salts to produce corrosion. This gas is corrosive to copper, copper alloys and precious metals such as silver and gold. Sensitive equipment and items containing these elements should be removed or protected prior to fumigation with **Phostoxin**.
- 3.1.14 **Phostoxin** or its residual dust must not come in contact with processed foods or commodity packages intended for retailers.
- 3.1.15 Respiratory protection approved for the concentration to which the fumigator will be exposed must be available if **Phostoxin** is to be applied from within the structure to be fumigated. Respiratory protection need not be available for application of Prepac from outside the structure to be fumigated if exposures above the permissible limits will not be encountered.

A NIOSH/MSHA approved, full-face gas mask - hydrogen phosphide canister combination may be used at levels up to 15 ppm. Above this level or in situations where the hydrogen phosphide concentration is unknown, a NIOSH/MSHA approved, self-contained breathing apparatus (SCBA) or its equivalent must be used.

- 3.1.16 Notify appropriate company employees prior to fumigation. Provide to local officials (fire department, rescue squad, police, etc.) on an annual basis relevant safety information for use in the event of an emergency.



### 3.2 Efficacy

**Phostoxin** has been found effective against the following insects and their preadult stages that is, eggs, larvae and pupae:

almond moth	European grain moth	Mediterranean flour moth
Angoumois grain moth	flat grain beetle	pink bollworm
bean weevil	fruit flies	raisin moth
bees	granary weevil	red flour beetle
cadelle	greater wax moth	rice weevil
cereal leaf beetle	hairy fungus beetle	rusty grain beetle
cigarette beetle	Hessian fly	saw-toothed grain beetle
confused flour beetle	Indian meal moth	spider beetles
dermestid beetles	Khapra beetle	tobacco moth
dried fruit beetle	lesser grain borer	yellow meal worm
dried fruit moth	maize weevil	

Although it is possible to achieve total control of the listed insect pests, this is frequently not realized in actual practice. Factors contributing to less than 100% control are leaks, poor gas distribution, unfavorable exposure conditions, etc. In addition, some insects are less susceptible to hydrogen phosphide than others. If maximum control is to be attained, extreme care must be taken in sealing, the higher dosages must be used, exposure periods lengthened, proper application procedures followed and temperature and humidity conditions must be favorable.

### 3.3 Exposure Conditions

The following table may be used as a guide in determining the minimum length of the exposure period at the indicated temperatures:

<u>Temperature</u>	<u>Phostoxin Tablet Prepac Minimum Exposure Periods</u>
below 40°F (5°C)	Do not fumigate
40°-53°F (5-12°C)	10 days (240 hours)
54°-59°F (12-15°C)	5 days (120 hours)
60°-68°F (16-20°C)	4 days (96 hours)
above 68°F (20°C)	3 days (72 hours)

The length of the fumigation must be great enough so as to provide for adequate control of the insect pests which infest the commodity being treated. Since insects are more tolerant to hydrogen phosphide at low temperatures, the length of exposure should be extended during colder weather. Additionally, aluminum phosphide produces gas more slowly in the cold at low humidity. Therefore, the fumigation period should be long enough for more or less complete reaction of **Phostoxin** with moisture so that little unreacted material remains. This will minimize worker exposures during further storage and/or processing of the treated bulk commodity as well as reduce hazards in the disposal of partially spent aluminum phosphide products remaining after space fumigations.

During periods of colder weather, the temperature of the commodity and insects may be significantly higher than the temperature to which the Prepac is exposed. It is often possible under these conditions to obtain satisfactory control of pests before the Prepac is totally spent. In these cases, it is permissible to conclude the fumigation as soon as effective control has been achieved. However, incompletely spent Prepacs must be further deactivated prior to disposal. See "Directions for Deactivation of **Phostoxin** Tablet Prepacs" on Page 16.

It should be noted that there is little to be gained by extending the exposure period if the structure to be fumigated has not been carefully sealed or if the distribution of gas is poor and insects are not subjected to lethal concentrations of hydrogen phosphide. Careful sealing is required to ensure that adequate gas levels are retained and proper application procedures must be followed to provide satisfactory distribution of hydrogen phosphide gas. Some structures can only be treated when completely tarped while others cannot be properly sealed by any means and should not be fumigated. Exposure times must be lengthened to allow for penetration of gas throughout the commodity when

fumigant is not uniformly added to the commodity mass, for example, by surface application or shallow probing. This is particularly important in the fumigation of bulk commodity contained in large storages.

Remember, exposure periods recommended in the table are minimum periods and may not be adequate to control all stored products pests under all conditions nor will they always provide for total reaction of **Phostoxin**, particularly if temperatures and commodity moisture levels or humidity are low during the fumigation.

**3.4 Commodities Which May be Fumigated with Phostoxin**

**Phostoxin** may be used for the fumigation of listed raw agricultural commodities, animal feed and feed ingredients, processed foods, tobacco and certain other nonfood items.

**3.4.1 Raw Agricultural Commodities, Animal Feed and Feed Ingredients Which May Be Fumigated with Phostoxin**

almonds	filberts	rye
animal feed & feed ingredients	flower seed	safflower seed
barley	grass seed	sesame seed
Brazil nuts	millet	seed & pod vegetables
cashews	oats	sorghum
cocoa beans	peanuts	soybeans
coffee beans	pecans	sunflower seeds
corn	pistachio nuts	triticale
cottonseed	popcorn	vegetable seed
dates	rice	walnuts
		wheat

**3.4.2 Processed Foods**

The listed processed foods may be fumigated with **Phostoxin** Prepac's. Under no condition shall any processed food or bagged commodity come in contact with **Phostoxin** tablets, pellets or residual dust except that **Phostoxin** may be added directly to processed brewer's rice, malt and corn grits for use in the manufacture of beer.

**Processed Foods Which May Be Fumigated With Phostoxin**

- Processed Candy and Sugar
- Cereal Flours and Bakery Mixes
- Cereal Foods (including cookies, crackers, macaroni, noodles, pasta, pretzels, snack foods and spaghetti)
- Processed Cereals (including milled fractions and packaged cereals)
- Cheese and Cheese Byproducts
- Chocolate and Chocolate Products (assorted chocolate, chocolate liquor, cocoa, cocoa powder, dark chocolate coating and milk chocolate)
- Processed Coffee
- Corn Grits
- Cured, Dried and Processed Meat Products and Dried Fish
- Dates and Figs
- Dried Eggs and Egg Yolk Solids
- Dried Milk, Dried Powdered Milk, Nondairy Creamers, and Nonfat Dried Milk
- Dried or Dehydrated Fruits (apples, dates, figs, peaches, pears, prunes, raisins and sultanas)
- Processed Herbs, Spices, Seasonings and Condiments
- Malt
- Processed Nuts (almonds, apricot kernels, Brazil nuts, cashews, filberts, peanuts, pecans, pistachio nuts and walnuts)
- Processed Oats (including oatmeal)
- Rice (brewer's rice grits, enriched and polished, wild rice)
- Soybean Flour and Milled Fractions
- Processed Tea
- Dried and Dehydrated Vegetables (beans, carrots, lentils, peas, potato flour, potato products and spinach)
- Yeast (including primary yeast)

3.4.3 **Nonfood Commodities, Including Tobacco**

The listed nonfood items may be fumigated with **Phostoxin**. Tobacco, psyllium seed and psyllium seed husks intended for drug use and certain other of the nonfood commodities should not be contacted by tablets, pellets or residual dust.

Only lots of psyllium seed and psyllium seed husks destined for shipment to pharmaceutical manufacturers may be fumigated. Such dedicated lots may be fumigated in transport vehicles (truck trailers, railcars, containers) prior to shipment. In addition, psyllium seed and husks may be fumigated at other locations only under direct instructions from the pharmaceutical company.

**Nonfood Commodities Which May Be Fumigated With Phostoxin**

- Processed or Unprocessed Cotton, Wool and Other Natural Fibers or Cloth, Clothing
- Straw and Hay
- Feathers
- Human Hair, Rubberized Hair, Vulcanized Hair, Mohair
- Leather Products, Animal Hides and Furs
- Tobacco
- Wood, Cut Trees, Wood Chips and Wood and Bamboo Products
- Paper and Paper Products
- Psyllium Seed and Psyllium Seed Husks
- Dried Plants and Flowers
- Seeds (grass seed, ornamental herbaceous plant seed and vegetable seed)

3.5 **Recommended Dosages**

Hydrogen phosphide is a mobile gas and will penetrate to all parts of the storage structure. Therefore, dosage must be based upon the total volume of the space being treated and not on the amount of commodity it contains. The same amount of **Phostoxin** is required to treat a 10,000 bushel bin whether it is empty or full of commodity unless, of course, the surface of the commodity is sealed off by a tarpaulin.

The allowable dosage range is **one Prepac (33 g of hydrogen phosphide) per 230 to 1650 cubic feet**. **Note: The maximum dosage for dates, nuts and dried fruits is one Prepac per 825 cubic feet**. This dosage is not to be exceeded. It is important to be aware that a shortened exposure period cannot be fully compensated for with an increased dosage of hydrogen phosphide.

The wide dosage range listed above is required to handle the variety of fumigation situations encountered in practice. Somewhat higher dosages are usually recommended under cooler, drier conditions or where exposure periods are relatively short. However, the major factor in selection of dosage is the ability of the structure to hold hydrogen phosphide gas during the fumigation. A good illustration of this point is comparison of the low dosages required to treat modern, well-sealed warehouses with the higher range used for poorly constructed buildings that cannot be sealed adequately. In certain other fumigations, proper distribution of lethal concentrations of gas to reach all parts of the structure becomes a very important factor in dose selection. An example where this may occur is in the treatment of grain stored in tall silos. Poor gas distribution frequently results when the fumigant cannot be uniformly added to the grain and it must be treated by surface application.

Although it is permissible to choose from the full dosage range listed above, the following dosage ranges are recommended for the various types of fumigations:

**Recommended Phostoxin Prepac Dosages for Various Types of Fumigations**

		<u>Volume Range Per Prepac</u>
		Cubic Feet
1.	Space	
	mills, warehouses, etc.	550 - 1650
	bagged, commodities	550 - 1100
	processed dried fruits and nuts	825 - 1650
2.	stored tobacco	825 - 1650
	Bulk Stored Commodities	
	vertical storage	550 - 1100
	tanks	470 - 1100

flat storages (loose construction)	230 - 660
farm bins	230 - 470
bunkers & tarped ground storages	410 - 1100
railcars	510 - 1100
barges	230 - 660
shipholds	500 - 1100

Higher dosages are recommended in structures that are of loose construction and in the fumigation of bulk stored commodities in which diffusion will be slowed and result in poor distribution of hydrogen phosphide gas.

3.6 **Application Procedures**

Listed commodities may be fumigated in bulk, in bags or in packages under gas-proof tarpaulins, in warehouses, silos, bins, flat stores, ships, unmanned barges or in other sealable enclosures where they are stored commercially and which can be made sufficiently gas tight. They may also be fumigated in sealed box or hopper cars and containers or other transport vehicles shipped piggyback by rail (static or rolling). Do not move trucks, trailers, containers, vans, etc., over public roads or highways until they have been aerated and the warning placards removed.

The following instructions are intended to provide general guidelines for typical fumigations. These instructions are not intended to cover every type of situation nor are they meant to be restrictive. Other procedures may be used if they are safe, effective and consistent with the properties of aluminum phosphide products.

3.6.1 **Fumigation of Flat Storages, Bunkers, Farm Storages, Vertical Storages**

**Phostoxin** Tablet Prepacs are intended primarily for application at or near the surface of the commodity to be treated. The Prepacs may be applied directly atop the commodity or affixed to cardboard or other rigid material which is then placed on the surface. Prepacs may also be placed below the surface by probing if they can be anchored and marked for easy retrieval after completion of the exposure period.

Surface application may be used if the storage can be made sufficiently gas tight to contain the fumigant gas long enough for it to penetrate the commodity.

This procedure is not recommended for leaky structures or when a considerable depth of bulk commodity must be penetrated to assure effective gas concentrations in all parts of the storage. In these instances, it is advisable to place about 25 percent of the dosage in the floor level aeration ducts. Check the ducts prior to addition of **Phostoxin** Prepacs to make sure that they contain no liquid water. Tarping of the surface of the commodity is often advisable, particularly if the overhead of the storage cannot be well sealed.

Close and lock all entrances to the storage and post fumigation warning placards.

3.6.2 **Fumigation of Railcars, Containers, Trucks, Vans and Other Transport Vehicles**

Railcars and containers, trucks, vans and other transport vehicles shipped piggyback by rail may be fumigated intransit. However, it is not legal to move trucks, trailers, containers, vans, etc., over public roads or highways until they have been aerated.

Care must be taken to seal all doors, hatches, vents, cracks or other leaks, particularly if the fumigation is to be carried out intransit. Prepacs may be mounted by taping them to a cardboard Fumi-Disc or other rigid material. Although the Tablet Prepac is porous on both sides, it is recommended that they be mounted so that the printed side can be seen. The Prepac provides for maximum access of air to the **Phostoxin** tablets. Take care that tape is not applied to any of the fleece material covering the tablets. The Prepacs thus mounted may then be applied by securing the Fumi-Disc in the hatch or atop the load. If poly is applied to seal the hatch cover, do not allow it to sag and cover the Prepac. Several 3 to 4 inch spacers placed atop the Fumi-Disc may be used to ensure that the top fleece remains open to the air. Prepacs may be mounted onto nylon slings or cardboard racks fitted across the opening of slot top hopper cars. As before, use caution to assure that poly material for sealing the hatches does not sag onto the Prepac.

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See Section 6 of this Applicator's Manual for recommendations on placarding. Both doors of box cars should be placarded. Place fumigation warning placards on both sides of hopper cars near the ladders

be placed below the surface by probing if they can be anchored and marked for easy retrieval after completion of the exposure period.

Surface application may be used if the storage can be made sufficiently gas tight to contain the fumigant gas long enough for it to penetrate the commodity.

This procedure is not recommended for leaky structures or when a considerable depth of bulk commodity must be penetrated to assure effective gas concentrations in all parts of the storage. In these instances, it is advisable to place about 25 percent of the dosage in the floor level aeration ducts. Check the ducts prior to addition of Phostoxin Prepacs to make sure that they contain no liquid water.

Tarping of the surface of the commodity is often advisable, particularly if the overhead of the storage cannot be well sealed.

Close and lock all entrances to the storage and post fumigation warning placards.

**Fumigation of Railcars, Containers, Trucks, Vans and Other Transport Vehicles**

Railcars and containers, trucks, vans and other transport vehicles shipped piggyback by rail may be fumigated intransit. However, it is not legal to move trucks, trailers, containers, vans, etc., over public roads or highways until they have been aerated.

care must be taken to seal all doors, hatches, vents, cracks or other leaks, particularly if the fumigation is to be carried out intransit. The Prepac may be taped to a Fumi-Kap or other porous support designed to be mounted inside the hatch. Alternatively, the Prepac may be taped to a cardboard Fumi-Disk or other similar material which may be mounted in the hatch. Although the Tablet Prepac is porous on both sides, it is recommended that they be mounted so that the printed side can be seen. The Prepac provides for maximum access of air to the Phostoxin tablets. Take care that tape is not applied to any of the fleece material covering the tablets. The Prepacs thus mounted may then be applied by securing the Fumi-Disc or Fumi-Kap in the hatch. If poly is applied to seal the hatch cover, do not allow it to sag and cover the Prepac. Several 3 to 4 inch spacers placed atop the Fumi-Disc may be used to ensure that the top fleece remains open to the air. Prepacs may be mounted onto nylon slings or cardboard racks fitted across the opening of slot top hopper cars. As before, use caution to assure that poly material for sealing the hatches does not sag onto the Prepac.

See Section 6 of this Applicator's Manual for recommendations on placarding. Both doors of box cars should be placarded. Place fumigation warning placards on both sides of hopper cars near the ladders and atop the hatches to which Phostoxin has been applied. Attach a packet of information for the consignee (available from DEGESCH America, Inc.) if the transport vehicle is to be shipped under fumigation. Notify the consignee.

Proper handling of treated railcars at their destination is the responsibility of the consignee. The consignee must be familiar with the properties of hydrogen phosphide fumigants, worker exposure limits and symptoms and first aid treatment for hydrogen phosphide poisonings and must know how to make gas concentration measurements. Unless prior arrangements have been made to return the railcar containing the spent fumigant back to the shipper, consignees must also be familiar with proper procedures for deactivation and disposal of spent fumigant. Unaerated railcars being returning in this manner must bear fumigation warning placards and must be carefully sealed. If the railcar containing spent fumigant is not being returned to the shipper, the consignee must:

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and atop the hatches to which **Phostoxin** has been applied. Attach a packet of information for the consignee (available from DEGESCH America, Inc.) if the transport vehicle is to be shipped under fumigation. Notify the consignee.

Proper handling of treated railcars at their destination is the responsibility of the consignee. The consignee must be familiar with the properties of hydrogen phosphide fumigants, worker exposure limits and symptoms and first aid treatment for hydrogen phosphide poisonings and must know how to make gas concentration measurements. Unless prior arrangements have been made to return the railcar containing the spent fumigant back to the shipper, consignees must also be familiar with proper procedures for deactivation and disposal of spent fumigant. Un-aerated railcars being returning in this manner must bear fumigation warning placards and must be carefully sealed. If the railcar containing spent fumigant is not being returned to the shipper, the consignee must:

1. aerate the railcar and verify that it contains no more than 0.3 ppm hydrogen phosphide.
2. remove the fumigation warning placards,
3. remove and properly dispose of the spent fumigant,
4. ensure that workers exposure limits have not been exceeded,
5. transfer the fumigated commodity from the railcar, with or without prior aeration and
6. placard the new storage if it contains more than 0.3 ppm hydrogen phosphide.

**3.6.3 Fumigation Procedures for Mills, Food Processing Plants and Warehouses**

1. Using the label, calculate the duration of the fumigation and the dosage of Prepacs to be applied based upon the volume of the building, air and/or commodity temperature and the general tightness of the structure.
2. Carefully seal and placard the space to be fumigated.
3. Apply the Prepacs throughout the area to be treated. The Prepacs may be mounted on cardboard or other rigid material or taped to the flooring. Although the Tablet Prepac is porous on both sides, it is recommended that they be mounted so that the printed side can be seen. Take care that the Prepacs are not allowed to pile up so as to restrict access of air to the porous fleece. Do not apply Prepacs in areas where they may be contacted by liquid water from condensate, leaking pipes, rain, etc.
4. Doors leading to the fumigated space should be closed, sealed, locked and placarded with warning signs.
5. The fumigation period usually lasts from 3 to 5 days, depending upon the temperature and humidity. Upon completion of the exposure period, windows, doors, vents, etc., should be opened and the fumigated structure allowed to aerate. Do not enter the structure without respiratory protection until the gas concentration is 0.3 ppm or below. When required, gas concentration readings may be taken using low level detector tubes or similar devices to ensure safety of personnel who reenter the treated area. Refer to the section on Applicator and Worker Exposure for monitoring requirements during application of fumigant and reentry.
6. Collect the spent **Phostoxin** Prepacs for disposal, with or without further deactivation, following recommendations given under Disposal Instructions. Make sure that all of the material applied has been accounted for.
7. Remove fumigation warning placards from the aerated structure.

**3.6.4 Fumigations Under Tarpaulins and In Small Sealable Structures and Enclosures**

Use of plastic sheeting or tarpaulins to cover commodities is one of the easiest and least expensive means for providing relatively gas tight enclosures which are very well suited for fumigation. Poly tarps are penetrated only very slowly by hydrogen phosphide gas, and tight coverings are readily formed from the sheets. The volume of these enclosures may vary widely from a few cubic feet; for example, a fumigation tarpaulin placed over a small stack of bagged commodity, to a plastic bunker storage capable of holding 600,000 bushels of grain or more.

An enclosure suitable for fumigation may be formed by covering bulk or packaged commodity with poly sheeting. The sheets may be taped together to provide a sufficient width of material to ensure that adequate sealing is obtained. If the flooring upon which the commodity rests is of wood or other porous

material, it should be repositioned onto poly prior to covering for fumigation. The plastic covering of the pile may be sealed to the floor using sand or water snakes, by shoveling soil or sand onto the ends of the plastic covering or by other suitable procedures. The poly covering should be reinforced by tape or other means around any sharp corners or edges in the stack so as to reduce the risk of tearing. Thinner poly, about 2 mil, is suitable for most indoor tarp fumigations and for sealing of windows, doors and other openings in structures. However, 4 mil poly or thicker is more suitable for outdoor applications where wind or other mechanical stresses are likely to be encountered.

Prepacs mounted on cardboard or other rigid material may be applied to the tarped stack or bunker storage of bulk commodity through slits in the poly covering. Probing or other means of dosing may be used. Avoid application of large numbers of **Phostoxin** Prepacs at any one point. The Prepacs should be placed below the surface of the commodity if condensation or other source of moisture is likely to form beneath the poly. The slits in the covering should be carefully taped to prevent loss of gas once the dose has been applied. **Phostoxin** Prepacs are recommended for the treatment of bagged commodities and processed foods where direct contact with spent dust is prohibited or not desired.

Distribution of hydrogen phosphide gas is generally not a problem in the treatment of bagged commodities and processed foods. However, fumigation of larger bunker storages containing bulk commodity will require proper application procedures to obtain adequate results.

Place warning placards at conspicuous points on the enclosure.

Excellent results may be attained in the treatment of small enclosures or structures since it is often possible to control the temperature during fumigation and also to make the enclosure virtually gas tight. Take care not to overdose during these fumigations. A single Prepac will treat a space of from 230 to 1650 cubic feet.

**3.6.5 Fumigation of Ships**

**3.6.5.1 General Information**

1. Important - shipboard, intransit ship or shiphold fumigation is also governed by U.S. Coast Guard Regulation 46 CFR 147A. Refer to this regulation prior to fumigation.
2. DEGESCH **Phostoxin** Tablet Prepacs are classified by EPA as restricted use pesticides due to the acute inhalation toxicity of hydrogen phosphide (phosphine, PH<sub>3</sub>) gas. This product is for retail sale to and use only by certified applicators for those uses covered by the applicator's certification or persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of the certified applicator. Physical presence means on site or on the premises. Read and follow the label and the DEGESCH America, Inc., Applicator's Manual which contains complete instructions for the safe use of this pesticide.

**3.6.5.2 Pre-Voyage Fumigation Procedures**

1. Prior to fumigating a vessel for intransit cargo fumigation, the master of the vessel, or his representative, and the fumigator must determine whether the vessel is suitably designed and configured so as to allow for safe occupancy by the ship's crew throughout the duration of the fumigation. If it is determined that the design and configuration of the vessel does not allow for safe occupancy by the ship's crew throughout the duration of the fumigation, then the vessel will not be fumigated unless all crew members are removed from the vessel. The crew members will not be allowed to reoccupy the vessel until the vessel has been properly aerated and a determination has been made by the master of the vessel and the fumigator that the vessel is safe for occupancy.
2. The person responsible for the fumigation must notify the master of the vessel, or his representative, of the requirements relating to personal protection equipment\*, detection equipment and that a person qualified in the use of this equipment must accompany the vessel with cargo under fumigation. Emergency procedures, cargo ventilation, periodic monitoring and inspections, and first aid measures must be discussed with and understood by the master of the vessel or his representative.

\*Personal protection equipment means a NIOSH/MSHA approved respirator or gas mask fitted with an approved canister for phosphine. The canister is approved for use up to 15 ppm. SCBA or its equivalent must be used above 15 ppm or at unknown concentrations.

3. Seal all openings to the cargo hold or tank and lock or otherwise secure all openings, manways, etc., which might be used to enter the hold. The overspace pressure relief system of each tank aboard tankers must be sealed by closing the appropriate valves and sealing the openings into the overspace with gas-tight materials.
4. Placard all entrances to the treated spaces with fumigation warning signs.
5. If the fumigation is not completed and the vessel aerated before the manned vessel leaves port, the person in charge of the vessel shall ensure that at least two units of personal protection equipment and one gas or vapor detection device, and a person qualified in their operation be on board the vessel during the voyage.
6. During the fumigation or until a manned vessel leaves port or the cargo is aerated, the person in charge of the fumigation shall ensure that a qualified person using gas or vapor detection equipment tests spaces adjacent to spaces containing fumigated cargo and all regularly occupied spaces for fumigant leakage. If leakage of the fumigant is detected, the person in charge of the fumigation shall take action to correct the leakage, or shall inform the master of the vessel, or his representative, of the leakage so that corrective action can be taken.
7. Review with the master, or his representative, the safety precautions and procedures required during the voyage.

**3.6.5.3 Application Procedures for Bulk Dry Cargo Vessels and Tankers**

1. Apply Prepacs which have been mounted onto cardboard or other rigid material to surface of the commodity. Prepacs may be probed below the surface if they are attached to a cord and marked for easy retrieval.
2. Immediately after application of the fumigant, close and secure all hatch covers, tank tops, butterworth valves, manways, etc.

**3.6.5.4 Intransit Fumigation of Containers Aboard Ships**

Intransit fumigation of containers on ships is also governed by U. S. Coast Guard Regulation 46 CFR 147A as modified by U. S. Coast Guard Special Permit 52-75. This permit which must be obtained prior to the fumigation is available from:

Commandant  
U. S. Coast Guard  
Hazardous Materials Standards Div.  
GMSO-3  
Washington, DC 20593-0001

Application procedures for fumigation of raw commodities or processed foods in containers and other transport vehicles are described in Section 3.6.2.

**3.6.5.5 Precautions and Procedures During Voyage**

1. Using appropriate gas detection equipment, monitor spaces adjacent to areas containing fumigated cargo and all regularly occupied areas for fumigant leakage. If leakage is detected, the area should be evacuated of all personnel, ventilated, and action taken to correct the leakage before allowing the area to be occupied.
2. Do not enter fumigated areas except under emergency conditions. If necessary to enter a fumigated area, appropriate personal protection equipment must be used. Never enter fumigated areas alone. At least one other person, wearing personal protection equipment, should be available to assist in case of an emergency.

**3.6.5.6 Precautions and Procedures During Discharge**

1. If necessary to enter a treated area prior to discharge, test spaces directly above commodity surface for fumigant concentration, using appropriate gas detection and personal safety equipment. Do not allow entry to fumigated areas without personal safety equipment, unless fumigant concentrations are at safe levels, as indicated by a suitable detector.



**3.6.6 Fumigation of Barges**

Barge fumigations are also regulated by U. S. Coast Guard Regulation 46 CFR 147A as modified by U. S. Coast Guard Special Permit 2-75. This permit which must be obtained prior to the fumigation is available from:

Commandant  
U. S. Coast Guard  
Hazardous Materials Standards Div.  
GMSO-3  
Washington, DC 20593-0001

**4. PROTECTIVE CLOTHING**

It is not necessary to wear gloves or other protective clothing when handling **Phostoxin** Prepacs. However, wear dry gloves of cotton or other material if contact with **Phostoxin** tablets, pellets or dust is likely. Wash hands thoroughly after handling aluminum phosphide products. Aerate used gloves and other contaminated clothing in a well ventilated area prior to laundering.

**5. RESPIRATORY PROTECTION**

**5.1 When Respiratory Protection Must Be Worn**

NIOSH/MSHA approved respiratory protection must be worn if worker exposure limits cannot be met through engineering controls (such as forced air ventilation) and/or appropriate worker practices. Respiratory protection is required if exposure is likely to exceed the eight hour TWA of 0.3 ppm during application, or a 0.3 ppm ceiling at any time afterwards. For example, respiratory protection is required to be worn upon reentry into a partially aerated structure if the hydrogen phosphide concentration is above 0.3 ppm. When required, gas concentration measurements for safety purposes may be made using low level detector tubes. See the section on Applicator and Worker Exposure for monitoring requirements. Information on hydrogen phosphide (phosphine, PH<sub>3</sub>) detector tubes may be obtained from DEGESCH America, Inc., or your DEGESCH distributor.

**5.2 Permissible Gas Concentration Ranges for Respiratory Protection Devices**

A NIOSH/MSHA approved, full-face gas mask - hydrogen phosphide canister combination may be used at levels up to 15 ppm or to escape from levels up to 1500 ppm. Above this level or in situations where the hydrogen phosphide concentration is unknown, a NIOSH/MSHA approved, self-contained breathing apparatus (SCBA) or its equivalent must be used. The NIOSH/OSHA Pocket Guide, 8-85, DHEW/NIOSH 78-210, lists these and other types of approved respirators and the concentration limits at which they may be used.

**5.3 Requirements for Availability of Respiratory Protection**

If **Phostoxin** is 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. In addition, 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. 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.

**6. PLACARDING OF FUMIGATED AREAS**

The applicator must placard or post all entrances to the structures under fumigation with signs bearing, in English and Spanish:

1. The signal word DANGER/PELIGRO and the SKULL AND CROSSBONES symbol in red.
2. The statement "Area and/or commodity under fumigation, DO NOT ENTER/NO ENTRE".

- 3. The statement, "This sign may only be removed after the commodity is completely aerated (contains 0.3 ppm or less of hydrogen phosphide gas). If incompletely aerated commodity is transferred to a new site, the new site must also be placarded if it contains more than 0.3 ppm. Workers must not be exposed to more than 0.3 ppm hydrogen phosphide."
- 4. The date and time fumigation begins and is completed.
- 5. Name of fumigant used.
- 6. Name, address and telephone number of the applicator.

All entrances to a fumigated area must be placarded. Where possible, placards should be placed in advance of the fumigation to keep unauthorized persons away. For railroad hopper cars, placards must be placed on both sides of the car near the ladders and next to the top hatches into which the fumigant is introduced.

Do not remove placards until the treated commodity is aerated down to 0.3 ppm hydrogen phosphide or less. To determine whether aeration is complete, each fumigated site or vehicle must be monitored and shown to contain 0.3 ppm or less hydrogen phosphide gas in the air space around and, if feasible, in the mass of the commodity. Transfer of incompletely aerated commodity to a new site is permissible. However, the new storage must be placarded if it contains more than 0.3 ppm hydrogen phosphide. No placarding is required if aeration occurs during transfer. Workers who handle incompletely aerated commodity must be informed and appropriate measures taken (i.e., ventilation or respiratory protection) to prevent exposures from exceeding 0.3 ppm hydrogen phosphide.

It is recommended that the persons responsible for removing placards be familiar with the physical, chemical and toxicological properties of hydrogen phosphide. They should also be knowledgeable in making gas concentration measurements, exposure limits and symptoms and first aid treatment for hydrogen phosphide poisoning.

**7. AERATION OF FUMIGATED COMMODITIES**

**7.1 Foods and Feeds**

Tolerances for hydrogen phosphide residues have been established at 0.1 ppm for animal feeds and 0.01 ppm for finished foods. To guarantee compliance with these tolerances, it is necessary to aerate these commodities for 48 hours prior to offering them to the end consumer. As an alternative to this aeration period, each container of the treated commodity may be analyzed for residues using accepted analytical methods.

**7.2 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. Tobacco fumigated in containers with plastic liners will probably require longer aeration periods to reach 0.3 ppm.

**8. APPLICATOR AND WORKER EXPOSURE**

**8.1 Hydrogen Phosphide Exposure Limits**

Exposure to hydrogen phosphide gas may not exceed 0.3 ppm, measured as an eight hour time-weighted average (TWA), for applicators and workers during application. Application is defined as the time period covering the opening of the first container, applying the appropriate dosage of fumigant and closing up the site to be fumigated. All persons in the treated site and in adjacent indoor areas are covered by this exposure standard.

After application, exposure for any person may not exceed a 0.3 ppm ceiling for hydrogen phosphide. Such exposures may occur if the commodity or space under fumigation leaks, when treated commodity is transferred or handled, if an unaerated or partially aerated space is entered, etc.

**8.2 Application of Fumigant**

Depending upon temperature and humidity, DEGESCH Phostoxin Prepacs release hydrogen phosphide gas slowly upon exposure to moisture from the air. In most cases, this release is slow enough to permit applicators to deposit fumigant in the desired areas and then vacate the premises

without significant exposure to the gas. If the fumigator's exposure exceeds the eight hour TWA of 0.3 ppm, approved respiratory protection must be worn. When required, gas concentration measurements for safety purposes may be made using low level detector tubes. See the writeup below on Industrial Hygiene Monitoring. Information on hydrogen phosphide (phosphine, PH<sub>3</sub>) detector tubes may be obtained from DEGESCH America, Inc., or your DEGESCH distributor.

It is often advisable to wear respiratory protection during application of fumigant under hot and humid conditions, particularly when considerable time must be spent inside the structure being treated.

### 8.3 Leakage from Fumigated Sites

Hydrogen phosphide is highly mobile and given enough time may penetrate seemingly gas-tight materials such as concrete and cinder block. Therefore, adjacent, enclosed areas likely to be occupied should be examined to ensure that significant leakage has not occurred. Sealing of the fumigated site and/or air flow in the occupied areas must be sufficient to meet exposure standards.

### 8.4 Aeration and Reentry

If the area is to be entered after fumigation, it must be aerated until the level of hydrogen phosphide gas is 0.3 ppm or below. The area or site must be monitored to ensure that liberation of gas from the treated commodity does not result in the development of unacceptable levels of hydrogen phosphide. Do not allow reentry into treated areas by any person before this time unless protected by an approved respirator.

### 8.5 Handling Un aerated Commodities

Workers must not be exposed to hydrogen phosphide in excess of 0.3 ppm during moving, storage or processing of incompletely aerated commodities.

### 8.6 Industrial Hygiene Monitoring

It is recommended that hydrogen phosphide exposures be documented in an operations log or manual for each site and operation where exposures may occur. The purpose of this monitoring is to prevent excessive exposures and to determine when and where respiratory protection is required. This monitoring is mandatory although, once exposures have been adequately characterized, subsequent monitoring is not routinely required. However, spot checks should be made occasionally, especially if conditions change significantly or if an unexpected garlic odor is detected. Gas measurements should be made in the worker's breathing zone. Monitoring is not required for outdoor operations.

If monitoring shows that workers are exposed to concentrations in excess of the permitted limits, then engineering controls (such as forced air ventilation) and/or appropriate work practices should be used, where possible, to reduce exposure to within permitted limits.

There are a number of devices on the market for the measurement of hydrogen phosphide gas levels for industrial hygiene purposes. One of these is the hydrogen phosphide detector tube used in conjunction with the appropriate hand-operated air sampling pump. These devices are reliable, portable, simple to use, do not require extensive training and are relatively rapid, inexpensive and accurate. Low level detector tubes are available which can detect 0.1 ppm and are suitable for industrial hygiene monitoring.

## 9. STORAGE INSTRUCTIONS

1. Store **Phostoxin** 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 **Phostoxin** Tablet Prepacs are supplied in gas-tight aluminum foil pouches packed inside a metal pail. The pouches are not resealable and, once opened, all the Prepacs in that pouch must be used.
4. The shelf life of **Phostoxin** is virtually unlimited as long as the containers are tightly sealed.

## 10. DISPOSAL INSTRUCTIONS

### 10.1 General

- 10.1.1 Do not contaminate water, food or feed by storage or disposal.
- 10.1.2 Unreacted or partially reacted **Phostoxin** 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 11 of this manual, Spill and Leak Procedures.
- 10.1.3 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.
- 10.1.4 Dispose of containers in a sanitary landfill or by other procedures approved by state and local authorities.
- 10.1.5 If properly exposed, the residual dust remaining after a fumigation with **Phostoxin** will be a grayish-white powder. This will be a non-hazardous waste and contain only a small amount of unreacted aluminum phosphide. However, residual dust from incompletely exposed **Phostoxin**, so called "green dust," will require special care.

### 10.2 Directions for Disposal of Phostoxin Tablet Prepac

- 10.2.1 Confinement of partially spent Prepac may result in a fire hazard. Small amounts of hydrogen phosphide may be released from unreacted aluminum phosphide, and confinement of the gas can result in a flash. **Caution:** Do not collect partially spent Prepac in large drums, plastic bags, dumpsters or other containers where confinement may occur.
- 10.2.2 Ignition may occur if large numbers of incompletely reacted Prepac are contacted by liquid water. This can occur in open or perforated storage containers. Therefore, such storage should be out of doors in a relatively isolated area protected from rain. Wire baskets, suitable for storage and further deactivation, may be obtained from DEGESCH America, Inc.
- 10.2.3 Small amounts of Prepac, up to about 7 kg, may be disposed of on site by burial in an open area.
- 10.2.4 Spent **Phostoxin** Prepac may be collected and disposed of at a sanitary landfill, incinerator, or other approved sites or by other procedures approved by Federal, State or Local authorities. Prepac containing "green dust" must be further deactivated before disposal at a landfill. Do not confine partially spent Prepac during transport to disposal sites.

### 10.3 Directions for Deactivation of Phostoxin Tablet Prepac

- Incompletely reacted **Phostoxin** Prepac must be deactivated further prior to ultimate disposal. This is especially true in cases of incomplete exposure which has resulted in so-called "green dust" or following a fumigation which has produced large quantities of partially spent Prepac.
- 10.3.1 **Phostoxin** Prepac may be "dry deactivated" by storing the strips in a locked, steel wire disposal basket or similar ventilated container. These baskets are available from DEGESCH America, Inc. The wire basket must be kept in a well-ventilated area that is protected from rain. As time permits, or when the container is full, take the Prepac strips to an approved site for disposal. Storage of partially spent Prepac in a closed container may result in a fire hazard. Large numbers of Prepac stored in open containers may ignite if contacted by liquid water.
- 10.3.2 Prepac may also be "dry deactivated" by spreading them out on the ground in a secure, open area away from inhabited buildings to be deactivated by atmospheric moisture. Care should be taken to ensure that the Prepac 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. After deactivation, the spent Prepac may be gathered for disposal at approved sites.
- 10.3.3 **Phostoxin** Prepac may be deactivated as follows using the "Wet Method."
- 10.3.3.1 Deactivating solution is prepared by adding the appropriate amount of low sudsing detergent or surface active agent to water in a drum or other suitable container. A 2% solution of detergent is suggested. The container should be filled with deactivating solution to within a few inches of the top.

- 10.3.3.2 In a well-ventilated area, out of doors, submerge the entire Prepac strip in the deactivating solution. The strips may float to the surface, 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 of the water.
- 10.3.3.3 The Prepac strips should be held under water in this manner for 36 hours. They may then be taken to an approved site for disposal. Dispose of the detergent solution at a sanitary landfill or other approved site or means. Where permissible, deactivating solution may be poured out onto the ground or it may be poured into a storm sewer.
- 10.3.3.4 **Caution:** Wear appropriate respiratory protection during wet deactivation of partially spent material. Do not cover the container being used for wet deactivation. Do not dispose of **Phostoxin** dust in a toilet.

## 11. SPILL AND LEAK PROCEDURES

### 11.1 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 hydrogen phosphide 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 **Phostoxin**. Water in contact with unreacted tablets or pellets will greatly accelerate the production of hydrogen phosphide gas which could result in a toxic and/or fire hazard. Wear dry gloves of cotton or other material when handling aluminum phosphide.

Return all intact aluminum foil pouches to their original steel pail provided that the pail has not been extensively damaged. Pouches which have been punctured, torn or damaged so as to leak may be temporarily repaired with aluminum tape. **Caution:** These damaged and repaired pouches may flash upon opening at some later time. Alternatively, the spilled and damaged pouches may be placed in a cardboard box or other packaging which has been suitably constructed and marked according to D.O.T. regulations. Transfer the damaged containers for inspection to an area suitable for pesticide storage. Notify consignee and shipper of damage. Further information and recommendations may be obtained, if necessary, from DEGESCH America, Inc.

In some spills, the product or its packaging may be so severely damaged that it cannot be stored for any appreciable length of time. If the product cannot be disposed of by use according to label instructions, it must be further deactivated prior to ultimate disposal. Small amounts of spillage may be spread out on the ground in a secure, 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. After deactivation, the spent Prepacs may be gathered for disposal at approved sites. Alternatively, wet deactivation may be carried out as described in the following.

### 11.2 Directions for Deactivation of Prepacs 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:

- 11.2.1 Deactivating solution is prepared by adding the appropriate amount of low sudsing detergent or surface active agent to water in a drum or other suitable container. A 2% solution or 4 cups in 30 gallons is suggested. The container should be filled with deactivating solution to within a few inches of the top.
- 11.2.2 The Prepacs are added slowly to the deactivating solution and stirred so as to thoroughly wet all of the **Phostoxin**. This should be done in the open air. Do not cover the container at any time. Prepac strips may float to the surface, 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 of the water.
- 11.2.3 Allow the mixture to stand for about 36 hours. The Prepacs will have reacted by this time and will then be safe for disposal.

- 11.2.4 The deactivated Prepac strips may then be disposed of at a sanitary landfill or other approved site. Dispose of the detergent solution at an approved site or by other approved procedures. Where permissible, the deactivation solution may be poured out onto the ground or it may be poured into a storm sewer.
- 11.2.5 **Caution:** Wear appropriate respiratory protection during wet deactivation of unexposed or incompletely exposed **Phostoxin**. Never place **Phostoxin** in a closed container such as a dumpster, sealed drum, plastic bag, etc., as flammable concentrations and a flash of hydrogen phosphide gas are likely to develop.
- 11.2.6 The EPA has determined that proper disposal of aluminum phosphide will cause no unreasonable adverse effects to the environment.

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