

August 30, 1985

PR NOTICE 85-6

CLARIFICATION OF LABEL IMPROVEMENT PROGRAM FOR FUMIGANTS:
REVISION OF PR NOTICE 84-5

"On November 15, 1984, the Agency issued PR Notice 84-5, Label Improvement Program for Fumigants, which prescribed label changes for fumigant products registered under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). The notice required that product labels for 11 fumigants and mixtures be revised in a number of ways, including upgraded precautionary statements, required use of respirators and detector devices, inclusion of reentry threshold levels, safe handling and disposal instructions, and, in some cases, restricted use statements. The notice required that label changes appear on products released for shipment after December 31, 1985, and on products in channels of trade as of June 30, 1986.

Based on comments received after the notice was issued, and on other developments pertinent to fumigant products, the Agency is making revisions and clarifications to PR Notice 84-5. At the same time, the Agency is extending the deadlines for making the revisions to accommodate these changes.

REVISION TO PR NOTICE 84-5

1. Ethylene oxide deleted. The Agency is withdrawing the Label Improvement Program requirements for ethylene oxide (EtO) products. The Occupational Safety and Health Administration (OSHA) has issued an occupational exposure standard for EtO. The Agency is developing label language that will be consistent with and complementary to the OSHA standard. Registrants of EtO products should take no further action to comply with the requirements of PR Notice 84-5, and should await Agency instructions before revising their labels.

2. Sulfuryl fluoride deleted. The Agency will soon be issuing a Registration Standard for sulfuryl fluoride. The labeling requirements of PR Notice 84-5 have been incorporated into that Registration Standard, including revisions of the type included under Items 4 and 5 of this PR Notice [lowered threshold concentration, revised placarding requirement]. The Registration Standard will also specify new dates for making the label revisions. Registrants of sulfuryl fluoride products should comply with the Registration Standard labeling requirements within the time frames established by the Standard labeling requirements within the time frames established by the Standard.

3. Aluminum and magnesium phosphide deleted. As a result of issuance of PR Notice 84-5, the Agency received a number of comments and requests for modification of the label requirements for Al/Mg phosphide. At the same time, the Agency has completed a review of data submitted in response to the Registration Standard

issued in 1981 for Al phosphide and in 1982 for Mg phosphide, which may result

in additional or different labeling requirements. Although this possibility was foreseen and expressly stated in PR Notice 84-5, the Agency believes that it should consolidate all label revisions into one document.

Accordingly, until the Agency notifies registrants of Al/Mg phosphide products of specific requirements, which will include many of those in PR Notice 84-5 and this notice, registrants of those products should take no further action to comply with the requirements of PR Notice 84-5. The Agency will notify registrants of the specific labeling requirements and will establish new compliance deadlines.

4. Threshold concentrations lowered. For all other fumigants listed in PR Notice 84-5, the threshold concentrations are revised as listed below. The Agency believes these levels are more protective to workers than the original threshold levels contained in PR Notice 84-5. These concentration levels are used to trigger requirements for respiratory protection and placarding of fumigated spaces. If at any time the fumigant levels exceed these concentrations, respiratory protection is required for persons in the area. Each Attachment to the Fumigant LIP listed the threshold concentration in several sections, including Respiratory Protection, Placarding of Fumigated Areas, Aeration and Reentry, and Spill and Leak Procedures. The revised concentrations, unless otherwise noted, are taken from "Threshold Limit Values for Chemical Substances in the Work Environment Adopted by the ACGIH for 1984-84," American Conference of Governmental Industrial Hygienists, 1984.

Note that the requirements and limits pertaining to carbon tetrachloride, ethylene dichloride, and carbon disulfide have no practical effect. The registrations of all products containing these fumigants have been voluntarily canceled, and they will be removed from channels of trade as of December 31, 1985. However, for completeness, the following table includes these chemicals.

<u>Fumigant</u>	<u>Attachment</u>	<u>Original level</u>	<u>Revised level</u>
Methyl bromide	A	15 ppm (60 mg/m ³)	5 ppm (20 mg/ ³)
Al/Mg phosphide	B	[Agency review of requirements in process]	
Chloropicrin	C (0.7mg/m ³)	0.3 ppm (2 mg/m ³)	0.1 ppm
Sodium and Calcium cyanide	D	10 ppm (10 mg/m ³)	same
Ethylene oxide	E	[Deleted from LIP]	

Sulfuryl fluoride	F	[Registration Standard will contain revised threshold concentration]
Ethylene dichloride	G	30 ppm (120 mg/m ³) 10 ppm (40mg/m ³)
Carbon tetrachloride	H	15 ppm (90 mg/m ³) 5 ppm (30mg/m ³)
Carbon disulfide	I	30 ppm (90 mg/m ³) 10 ppm (30mg/m ³)
Carbon tetrachloride + Carbon disulfide carbon	J	Insert new numbers listed above for carbon tetrachloride and disulfide
Carbon tetrachloride + Ethylene dichloride	K	Insert new numbers listed above for carbon tetrachloride and ethylene dichloride

5. Placarding requirements clarified. In each attachment, the unit entitled "Placarding of Fumigated Areas" is revised as follows:

a. After the list of required placarding information, add the following statement:

"Any person who transfers a treated commodity to another site without aeration must ensure that the new site is placarded until the commodity is aerated below the threshold concentration."

[This revision requires "downstream" placarding of any transferred fumigated commodity until it is aerated below the threshold concentration.]

b. The statement "Only the applicator may remove placards, and only when the concentration of [name of fumigant] in the treated site or commodity is below [threshold level]."

[This will permit railcars which are fumigated in transit to have placards removed at the receiving site by any applicator certified in fumigation techniques.]

6. Compliance date extended. In light of the changes made by this notice, the compliance dates for the remaining fumigants are revised as follows:

For products released for shipment: All products released for shipment by the registrant must bear revised labeling as of March 31, 1986.

For products in channels of trade: All products in channels of trade must bear revised labeling as of September 30, 1986.

FOR FURTHER INFORMATION

Further information on ethylene oxide may be obtained from John Lee, Product Manager 31, at 703-557-3675, or Walt Waldrop, Special Review Branch, at 703-557-7400. Questions of the remaining fumigants may be directed to Art Castillo, Product Manager 32, at 703-557-3965."

The Notice was signed:

Douglas D. Campt, Director
Registration Division