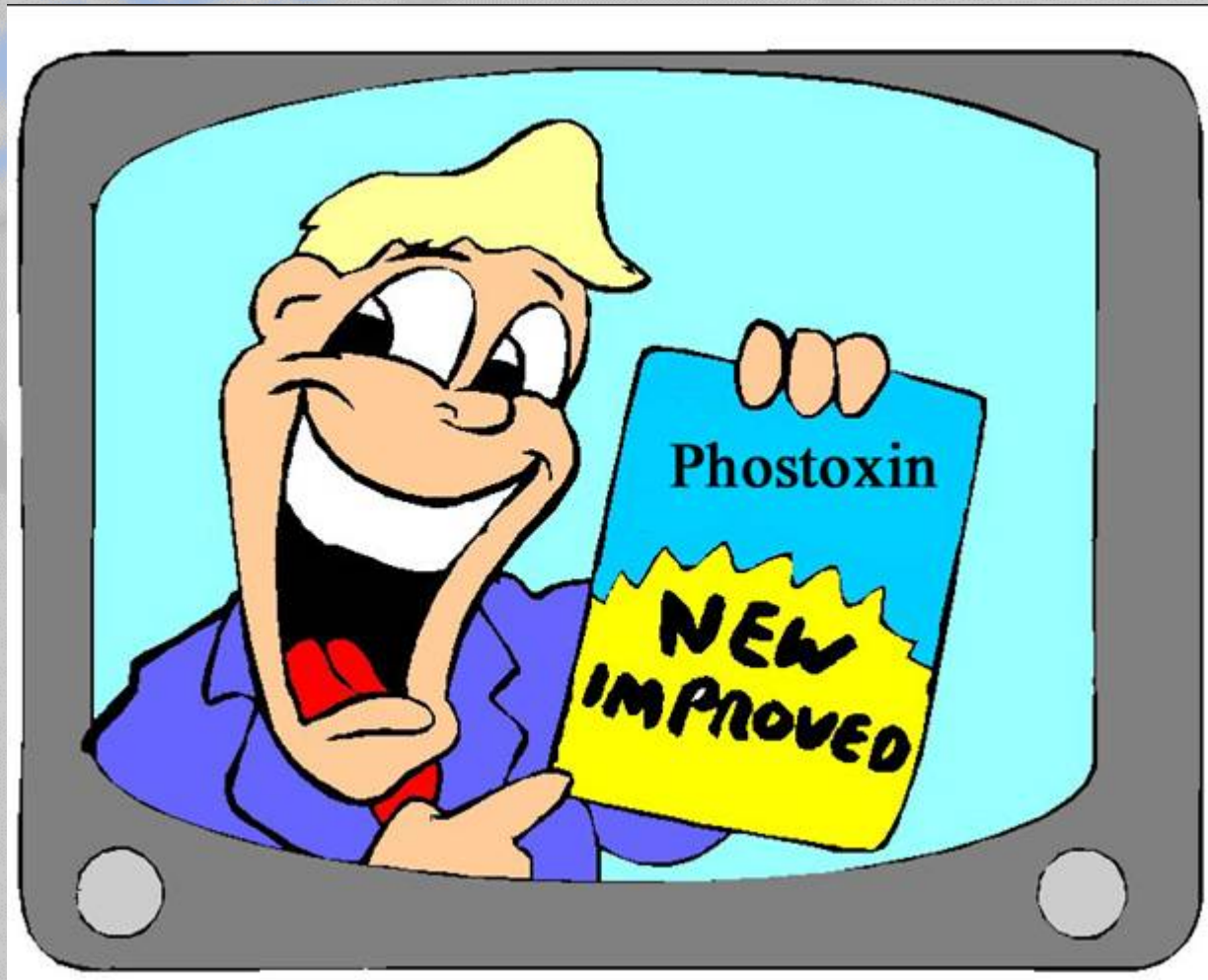


NEW PHOSTOXIN LABELING





History

All existing pesticides must undergo periodic re-registration by U.S. EPA

- Phosphine RED published December 1998 with 15 RMM's
- Coalition formed January 1999 to address concerns
- Comments, data gathering, scientific research and EPA education led to draft label acceptance in January 2002
- State regulator proposals and registrant responses in 2002 and 2003 produced this latest version

Timeline of Revisions

Initial Acceptance based on MOA

1. January 17, 2002
2. September 11, 2002
3. September 19, 2002
4. September 20, 2002
5. December 9, 2002
6. January 18, 2003
7. January 27, 2003
8. May 7, 2003
9. May 9, 2003
10. May 15, 2003



Applicator's Manual Comparison

RESTRICTED USE PESTICIDE
DUE TO ACUTE INHALATION TOXICITY OF
HIGHLY TOXIC HYDROGEN PHOSPHIDE
(PHOSPHINE, PH₃) 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
DEGESCH PHOSTOXIN®

PELLETS and TABLETS - R
EPA Reg. No. 40285-3 EPA Reg. No. 40285-1

FOR USE AGAINST INSECTS WHICH INFEST STORED
COMMODITIES AND CONTROL OF BURROWING PESTS

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

KEEP OUT OF REACH OF CHILDREN

DANGER - POISON - PELIGRO

PRECAUCION AL USUARIO: Si usted no lee inglés, 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 headaches, 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) 234-9261
EPA Est. No. 40285-VA-01
EPA Reg. No. 40285-1 and 40285-3

FORM 17628 (R 11/99) (P 11/99)

-VS-

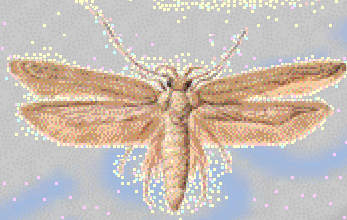
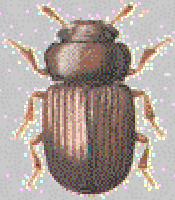


**RESTRICTED USE PESTICIDE
DUE TO ACUTE INHALATION TOXICITY OF
HIGHLY TOXIC HYDROGEN PHOSPHIDE
(PHOSPHINE, PH₃) GAS**

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.

New Restricted Use Statement

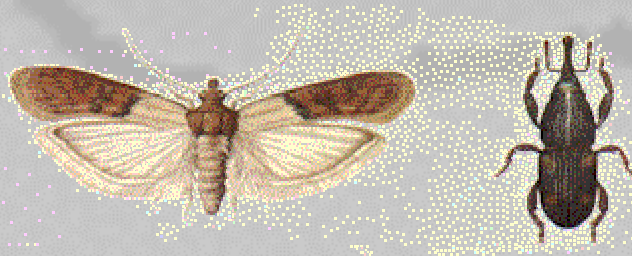
For retail sale to Dealers and Certified Applicators only. For use by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification. Refer to the directions in this applicator's manual for requirements of the physical presence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



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



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.



DEGESCH America, Inc.



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.





Persons with documented training in the handling of phosphine products must be responsible for receiving, aerating and removal of placards from vehicles which have been fumigated in transit. Refer to section 12 for training requirements.



DOSAGE

Old Label:

- Minimum and maximum dosage rate

New label:

- Maximum dosage rate
- Recommended dosage ranges





New Instructions



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 540.234.9281/1.800.330.2525 IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABELING

NEW!

INCIDENT REPORTING

NEW!

The registrant of the label must be informed by telephone of any adverse incident to human health or the environment involving their product so that records required by EPA can be maintained



NEW!

NEW!

THEFT OF PRODUCTS

The user must immediately report the theft of any phosphine fumigants to the local police department



NEW!

PLACARDING

NEW!



New label requirements:

- Placards must withstand adverse weather conditions
- Placards must have the name of the fumigation company and a 24-hour emergency telephone number
- Placards must contain the EPA registration number of the product

NEW!

TRANSPORTATION INSTRUCTIONS

NEW!

Old Label: No Instructions

New Label:

20.1 Transport Designations - The following transport designations apply to aluminum phosphide

Proper Shipping Name: Aluminum phosphide

Hazard Class: 4.3

Identification No.: UN 1397

Packing Group: PG I

Shipping Label: Dangerous When Wet/Poison

Shipping Placard: Dangerous When Wet

DEGESCH AMERICA, INC. COLUMBIA RIVER DIV. 1626 NE AIRPORT WAY PORTLAND, OR 97208 PHONE (503) 414-0796 FAX (503) 414-0792

COMMODITY TO: MV ALEXA COLUMBIA GRABN ELEVATOR PORTLAND, OR

BILL OF LADING

QUANTITY	DESCRIPTION	WEIGHT	UNIT	REMARKS
0	X	0	PCS.	ALUMINUM PHOSPHIDE 4.3 UN 1397 PG I DANGEROUS WHEN WET AND POISON LABELS APPLIED SHIPPER TYPED AND NOTED TO THE CL. 4.3.
1	PCS.			MISC. NON HAZARDOUS MATERIALS SEE DESCRIPTION BELOW
8				PHOTONIX PELLETS (10 CAMP)
1				DRAGER ACCURO PUMP
1				DRAGER PRO CASSETTE (12000)
1				DRAGER PHOSPHINE (1000000)
1				DRAGER K100W GAS MASK

AGENCY: PHIL S. DONELLO
DATE: 12/19/02
PLACARD PROVIDED



TRANSPORTATION EXEMPTION



20.2 Transportation Exemption:

Exemption: DOT-E 10753

Purpose and Limitation: "...The motor vehicles used under the terms of this exemption are not required 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.



SEALING OF STRUCTURES

Sealing requirements of the new label are far more detailed



21. FUMIGATION MANAGEMENT PLAN

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 a Fumigation Management Plan (FMP). The FMP is intended to ensure a safe and effective fumigation. The FMP must address characterization of the structure and/or area, and include appropriate monitoring and notification requirements, consistent with, but not limited to, the following:

1. Inspect the structure and/or area to determine its suitability for fumigation.



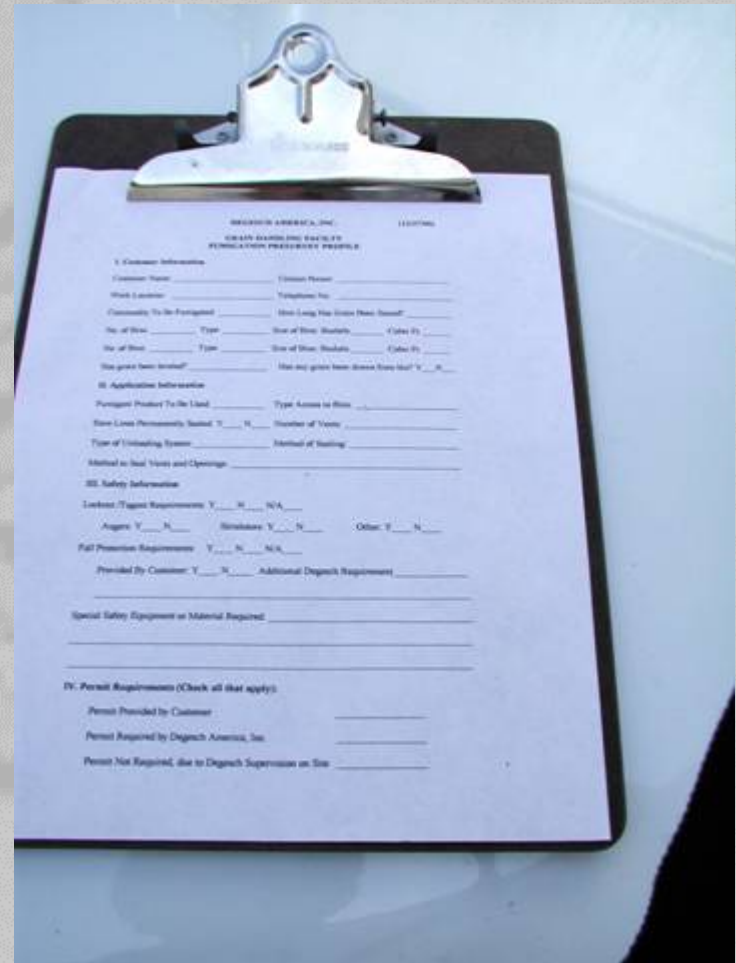
2. When sealing is required, consult previous records for any changes to the structure, seal leaks and monitor any occupied adjacent buildings to ensure safety.





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 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. Written notification must be provided to the receiver of a vehicle that is fumigated in transit.



DEGESCH America, Inc.





Railcar Aeration



12. TRAINING REQUIREMENTS FOR RECEIPT OF INTRANSIT VEHICLES UNDER FUMIGATION.

The trained person(s) must be trained by a Certified Applicator following the EPA accepted product applicators manual that must precede or be attached to the outside of a transport vehicle; 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:

- ✓ How to aerate the vehicle and verify that it contains no more than 0.3ppm phosphine



DEGESCH

OR

- ✓ 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.
- ✓ How to determine when respiratory protection must be worn.
- ✓ How to protect workers and nearby persons from exposure to levels above the 8 hour time weighted average (TWA) of 0.3 ppm or the 15 minute TWA short term exposure limit (STEL) of 1.0 ppm phosphine.
- ✓ Proper removal of placards from the vehicle.
- ✓ How to follow proper residual disposal instruction.

BURROW FUMIGATION

The new label is more forceful about the fact that Phostoxin must not be applied within 15 feet (5 meters) of a building that is, or may be, occupied by humans and/or animals and the fact that no burrow openings may be present beneath buildings.



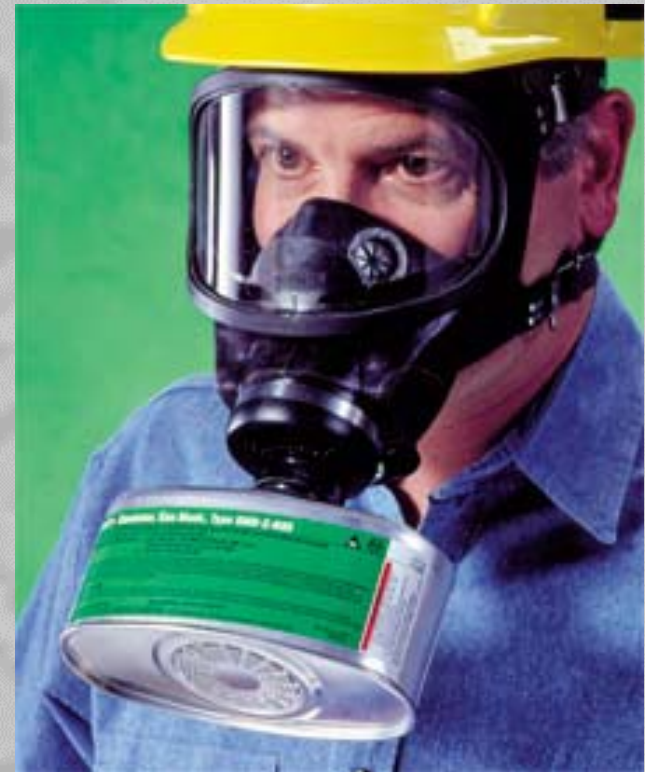
RESPIRATORY PROTECTION

Old Label:

- Fumigant applicators
 - 8 Hour TWA 0.3 – 15ppm
 - 15 Minute STEL 1.0 ppm
- All others
 - 0.3 ppm ceiling

New label:

- All workers
 - 8 Hour TWA 0.3 – 15ppm
 - 15 Minute STEL 1.0 ppm
 - Ceiling provision removed

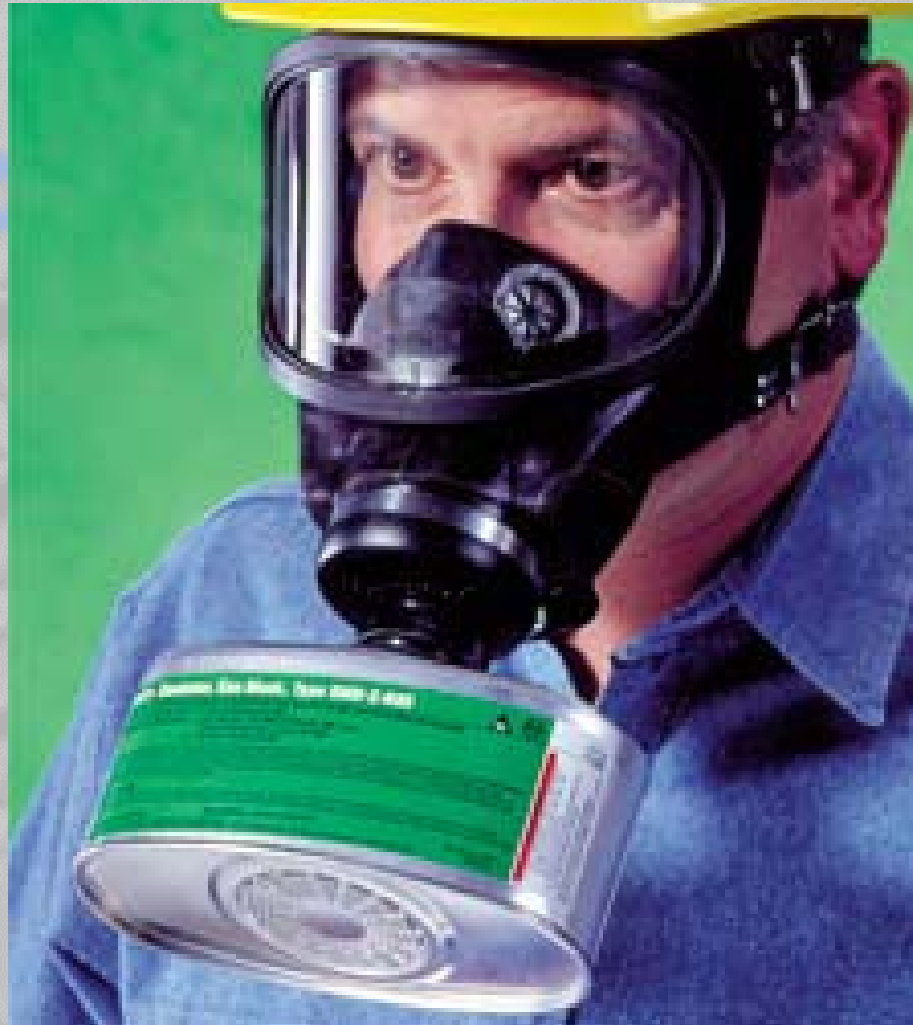


NIOSH/MSHA approved
full face gas mask



0-0.3ppm

No Respiratory Protection Required



0.3-15ppm = Full face canister mask



Above 15ppm or unknown concentration =SCBA



THE END