

RESTRICTED USE PESTICIDE

DUE TO HIGH ACUTE INHALATION TOXICITY OF PHOSPHINE GAS

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

THE COMPLETE LABEL FOR THIS PRODUCT CONSISTS OF THE CONTAINER LABEL AND THE APPLICATOR'S MANUAL WHICH MUST ACCOMPANY THE PRODUCT. READ AND UNDERSTAND THE ENTIRE LABELING AND APPLICATOR'S MANUAL.

THEREFORE EVERY CONTAINER/CYLINDER MUST HAVE AN APPLICATOR'S MANUAL DATED 01102022 ACCOMPANY IT. A FUMIGATION MANAGEMENT PLAN MUST BE WRITTEN FOR ALL FUMIGATIONS PRIOR TO ACTUAL TREATMENT. CONSULT WITH YOUR STATE LEAD PESTICIDE REGULATORY AGENCY TO DETERMINE REGULATORY STATUS, REQUIREMENTS, AND RESTRICTIONS FOR FUMIGATION USE IN THAT STATE. CALL 1-800-223-3684 DURING NORMAL WORK HOURS, CENTRAL TIME AND SELECT OPTION #1, IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABELING.

APPLICATOR'S MANUAL FOR 01102022 PH3 ALP Fumigant Tablets and Pellets

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

Active Ingredient: Aluminum Phosphide	60.0%
Other Ingredients	40.0%
Total	100.0%



KEEP OUT OF REACH OF CHILDREN
DANGER - POISON – PELIGRO

FOR BURROWING RODENT APPLICATIONS: THE USE OF THIS PRODUCT IS
STRICTLY PROHIBITED WITHIN 100 FEET OF ANY BUILDING WHERE HUMANS AND/OR DOMESTIC
ANIMALS DO OR MAY RESIDE ON SINGLE AND MULTI-FAMILY RESIDENTIAL PROPERTIES AND NURSING HOMES,
SCHOOLS (EXCEPT ATHLETIC FIELDS), DAYCARE FACILITIES AND HOSPITALS.

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.)

FOR CHEMICAL EMERGENCY, SPILL, LEAK, FIRE, EXPOSURE OR ACCIDENT, CALL 1-844-845-3129

EPA Registration Nos. 70506-13-1015 and 70506-14-1015

EPA Establishment No. 41876-IND-001



Manufactured for:

Douglas Products and Packaging Company

1550 E Old 210 Highway

Liberty, MO 64068 • 1-800-223-3684

TABLE OF CONTENTS

	PAGE
1. FIRST AID	4
2. NOTE TO PHYSICIAN	4
3. INTRODUCTION	4
4. PRECAUTIONARY STATEMENTS	5
4.1 Hazards to Humans and Domestic Animals	
4.2 Environmental Hazards	
4.3 Physical and Chemical Hazards	
5. DIRECTIONS FOR USE	6
6. PESTS CONTROLLED	6
7. COMMODITIES WHICH MAY BE FUMIGATED WITH PH3 ALP	6
7.1 Raw Agricultural Commodities, Animal Feed and Feed Ingredients	
7.2 Processed Foods	
7.3 Nonfood Commodities, Including Tobacco	
8. EXPOSURE CONDITIONS	7
9. DOSAGE RATES	8
9.1 Maximum Allowable Dosage for Fumigation with PH3 ALP	
9.2 PH3 ALP Advisory Dosage Rates for Various Types of Fumigation	
10. PROTECTIVE CLOTHING	10
10.1 Gloves	
11. RESPIRATORY PROTECTION	10
11.1 When Respiratory Protection Must Be Worn	
11.2 Permissible Gas Concentration Ranges for Respiratory Protection Devices	
11.3 Requirements for Availability of Respiratory Protection	
12. REQUIREMENTS FOR CERTIFIED APPLICATOR'S PRESENCE AND TRAINING FOR RECEIPT OF IN-TRANSIT VEHICLES UNDER FUMIGATION	10
12.1 Requirements for the Presence of a Certified Applicator	
12.2 Requirements for Authorized Training for Receipt of In-Transit Vehicles Under Fumigation	
13. GAS DETECTION EQUIPMENT	10
14. NOTIFICATION REQUIREMENTS	10
14.1 Authorities and On-Site Workers	
14.2 Incidents Involving These Products	
14.3 Theft of Products	
15. APPLICATOR AND WORKER EXPOSURE	10
15.1 Exposure Limits	
15.2 Application of Fumigant	
15.3 Leakage from Fumigated Sites	
15.4 Aeration and Reentry	
15.5 Handling Unaerated Commodities	
15.6 Industrial Hygiene Monitoring	
15.7 Engineering Controls and Work Practices	
16. PLACARDING OF FUMIGATED AREAS	11
17. SEALING OF STRUCTURES	11
18. AERATION OF FUMIGATED COMMODITIES	12
18.1 Foods and Feeds	
18.2 Non-Food Commodities	
18.3 Tobacco	

TABLE OF CONTENTS (continued)

	PAGE
19. STORAGE INSTRUCTIONS.....	12
19.1 Labeling of Storage	
20. TRANSPORT INSTRUCTIONS	12
20.1 Transportation Designations	
20.2 Transportation Exemption	
21. FUMIGATION MANAGEMENT PLAN	13
STEPS FOR PREPARATION OF A FUMIGATION PLAN	
21.1 Purpose	
21.2 A Checklist for a Fumigation Management Plan	
A. Preliminary Planning and Preparation	
B. Personnel	
C. Monitoring	
D. Notification	
E. Sealing Procedures	
F. Application Procedures and Fumigation Period	
G. Post-Application Operations	
22. APPLICATION PROCEDURES	15
22.1 Farm Bins	
22.2 Flat Storages	
22.3 Vertical Storages	
22.4 Mills, Food Processing Plants and Warehouses	
22.5 Railcars, Containers, Trucks, Vans, and other Transport Vehicles	
22.6 Tarpaulin and Bunker Fumigations	
22.7 In-Transit Shipholds	
22.8 Small Sealable Enclosures	
22.9 Beehives, Supers and Other Bee Keeping Equipment	
22.10 Burrowing Pest Control	
23. ENDANGERED SPECIES RESTRICTIONS.....	20
24. DISPOSAL INSTRUCTIONS	21
24.1 General	
24.2 Disposal of Aluminum Flasks	
24.3 Directions for Disposal of Residual Dust from PH3 ALP Fumigant Pellets and Tablets	
24.4 Directions for Deactivation of Partially Spent Residual Dust from PH3 ALP Fumigant Pellets and Tablets	
25. SPILL AND LEAK PROCEDURES.....	22
25.1 General Precautions and Directions	
25.2 Directions for Deactivation by Wet Method	

SECTION 1

FIRST AID

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

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

IF SWALLOWED	• Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Vomiting may off-gas and release phosphine, which could pose a risk of secondary contamination. • Do not give water (potential additional formation of phosphine) unless authorized by a physician. • Do not give anything by mouth to an unconscious person.
---------------------	--

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

IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for further treatment advice.
-------------------	---

EMERGENCY CONTACT NUMBER CALL 1-844-845-3129

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Contact 1-844-845-3129 for assistance with human or animal medical emergencies.

SECTION 2

NOTE TO PHYSICIAN

Aluminum phosphide in PH3 ALP Fumigant Tablets and Pellets reacts with moisture from the air, water, acids and many other liquids to release phosphine gas. Mild inhalation exposure causes malaise (indefinite feeling of sickness), ringing of ears, fatigue, nausea, and pressure in the chest, which is relieved by removal to fresh air. Moderate poisoning causes weakness, vomiting, and 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 (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 lack of urination). Pathology is characterized by hypoxia (oxygen deficiency in body tissue). Frequent exposure to subacute concentrations over a period of days or weeks may cause poisoning. Treatment is symptomatic.

SECTION 3

INTRODUCTION

PH3 ALP products are used to protect stored commodities from damage by insects. In limited areas, applications of PH3 ALP may be made to control burrowing vertebrate pests. For a list of approved burrowing rodent application sites see Section 22.

Fumigation of stored products with PH3 ALP in the manner prescribed in the labeling does not contaminate the marketed commodity.

PH3 ALP metal fumigants are acted upon by atmospheric moisture to produce phosphine (PH₃) gas.

PH3 ALP Fumigant Tablets and Pellets contain aluminum phosphide (AIP) as their active ingredient and will liberate phosphine via the following chemical reaction:



Phosphine 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 in Section 4 of this Applicator's Manual.

PH3 ALP Fumigant Tablets and Pellets also contain ammonium carbamate, which liberates ammonia and carbon dioxide as follows: $\text{NH}_2\text{COONH}_4 \rightarrow 2\text{NH}_3 + \text{CO}_2$

These gases are essentially nonflammable and act as inerting agents to reduce fire hazards.

PH3 ALP is prepared in two forms: Tablets and Pellets. The rounded Tablets weigh approximately 3 grams and release 1 gram of phosphine gas. They are about 16.5 mm in diameter and are bulk packaged in resealable aluminum flasks containing 500 tablets.

The Pellets weigh approximately 0.6 gram and release 0.2 gram of phosphine gas. They are about 9.5 mm in diameter and are also packaged in resealable flasks containing either 1660 or 2500 pellets.

Upon exposure to air, PH3 ALP Fumigant Tablets and Pellets begin to react with atmospheric moisture to produce small quantities of phosphine gas. This reaction starts slowly, gradually accelerates and then tapers off again as the aluminum phosphide is spent. PH3 ALP Fumigant Pellets react somewhat faster than Tablets. The rates of decomposition of the Tablets and Pellets will vary depending upon moisture and temperature conditions. For example, when moisture and temperature of the fumigated commodity are high, decomposition of PH3 ALP may be complete in less than 3 days. However, at lower ambient temperatures and humidity levels, decomposition of PH3 ALP may require 5 days or more. After decomposition, PH3 ALP leaves a gray-white powder composed almost entirely of aluminum hydroxide and other approved inert ingredients. This will cause no problems if the fumigant has been added directly to a commodity such as grain. However, the spent powder must usually be retrieved for disposal after space fumigations. If properly exposed, the spent PH3 ALP will normally contain only a small amount of unreacted aluminum phosphide and may be disposed of without hazard. While PH3 ALP is not considered a hazardous waste, partially spent residual dusts from incompletely exposed PH3 ALP will require special care. Precautions and instructions for further deactivation and disposal are given in Section 24 of this Applicator's Manual.

PH3 ALP Fumigant Tablets and Pellets are supplied in gas-tight containers and their shelf life is unlimited as long as the packaging remains intact. Once opened for fumigation, the aluminum flasks of Tablets or Pellets may be tightly resealed and stored for future use. Storage and handling instructions will be given in detail later in Sections 19 and 22 of the Applicator's Manual.

SECTION 4

PRECAUTIONARY STATEMENTS

4.1 HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Aluminum phosphide from PH3 ALP Tablets or Pellets or dust may be fatal if swallowed. Do not get in eyes, on skin or on clothing. Do not eat, drink or smoke while handling 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 phosphine which is an extremely toxic gas. If a garlic odor is detected, refer to the Industrial Hygiene Monitoring in Section 15.6 of this Applicator's Manual for appropriate monitoring procedures. Pure phosphine gas is odorless; the garlic odor is due to a contaminant. Since the odor of phosphine may not be detected under some circumstances, the absence of a garlic odor does not mean that dangerous levels of phosphine gas are absent. Observe proper reentry procedures specified in Section 15.4 to prevent overexposure.

4.2 ENVIRONMENTAL HAZARDS

This product is toxic to wildlife. Many non-target organisms exposed to phosphine gas in burrows will be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and pot-holes). Do not contaminate water by cleaning of equipment or disposal of wastes.

4.3 PHYSICAL AND CHEMICAL HAZARDS

Aluminum phosphide in Tablets and Pellets and partially spent dust will release phosphine if exposed to moisture from the air or if it comes into contact with water, acids and many other liquids. Since phosphine may ignite spontaneously at levels above its lower flammable limit of 1.8% v/v (18,000 ppm), it is important not to exceed this concentration. Ignition of high concentrations of phosphine can produce a very energetic reaction. Explosions can occur under these conditions and may cause severe personal injury. **Never allow the buildup of phosphine to exceed explosive concentrations.** Do not confine spent or partially spent metal phosphide fumigants as the slow release of phosphine from this material may result in formation of an explosive atmosphere. Aluminum phosphide Tablets and Pellets outside the containers should not be stacked or piled up or contacted with liquid water. This may cause a temperature increase, accelerate 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 because under certain conditions, they may flash upon opening. Containers may also be opened near a fan or other appropriate ventilation that will rapidly exhaust contaminated air. When opening, invert the container several times then point the container away from the face and body and slowly loosen the cap. 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 phosphine gas. If containers are opened inside the structure to be fumigated, air monitoring must be conducted to ensure worker's exposure to phosphine gas does not exceed the allowable limit of 8 hour Time Weighted Average (TWA) of 0.3 ppm or the 15 minute Short Term Exposure Limit (STEL) of 1.0 ppm Phosphine.

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

PH3 ALP Fumigant Tablets and Pellets are Restricted Use Pesticides due to the acute inhalation toxicity of phosphine gas. Read and follow the complete label, which contains instructions for the authorized use(s) of the pesticide.

Additional copies of this Manual are available from:

Douglas Products and Packaging Company
1550 E Old 210 Highway
Liberty, MO 64068
Telephone: 1-800-223-3684

During normal work hours, Central Time, select Option #1

SECTION 5

DIRECTIONS FOR USE

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

SECTION 6

PESTS CONTROLLED

PH3 ALP has been found to be effective against vertebrate and the following: (insects and their pre-adult stages, that is, eggs, larvae and pupae)

INSECTS

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

Africanized bees & honeybees infested with/tracheal mites

Vertebrate pests

Chipmunks
Ground squirrels
Mice
Moles
Norway rats
Pocket gophers
Prairie dogs (except Utah prairie dogs, *Cynomys Parvidens*)
Roof rats
Voles
Woodchucks
Yellowbelly marmots (rockchucks)

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

SECTION 7

COMMODITIES WHICH MAY BE FUMIGATED WITH PH3 ALP

PH3 ALP may be used for the fumigation of listed raw agricultural commodities, animal feed and feed ingredients, processed foods, tobacco and certain other nonfood items when their commodity temperature is above 40°F (5°C).

7.1 RAW AGRICULTURAL COMMODITIES, ANIMAL FEED AND FEED INGREDIENTS

PH3 ALP Fumigant Tables and Pellets may be added directly to animal feed, feed ingredients and raw agricultural commodities stored in bulk. For these commodities not stored in bulk, PH3 ALP may be placed in moisture-permeable envelopes, on trays, etc., and fumigated as with processed foods.

Raw Agricultural Commodities and Animal Feed and Feed Ingredients Which May Be Fumigated with PH3 ALP

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

7.2 PROCESSED FOODS

The listed processed foods may be fumigated with PH3 ALP. Under no condition shall any processed food or bagged commodity come in contact with PH3 ALP Fumigant Tablets or Pellets or residual dust except that PH3 ALP 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 PH3 ALP

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 (such as assorted chocolate, chocolate liquor, cocoa, cocoa powder, dark chocolate coating and milk chocolate products)
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 (such as apples, dates, figs, peaches, pears, prunes, raisins, citrus and sultanas)
Processed herbs, spices, seasonings and condiments
Malt
Processed nuts (such as almonds, apricot kernels, brazil nuts, cashews, filberts, macadamia nuts, peanuts, pecans, pistachio nuts, walnuts and other processed nuts)
Processed oats (including oatmeal)
Rice (brewer's rice grits, enriched and polished)
Soybean flour and milled fractions
Processed tea
Dried and dehydrated vegetables (such as beans, carrots, lentils, peas, potato flour, potato products and spinach)
Yeast (including primary yeast)
Wild rice
Other processed foods

7.3 NONFOOD COMMODITIES, INCLUDING TOBACCO

The listed nonfood items that may be fumigated with PH3 ALP Fumigant Tablets or Pellets or residual dust should not contact tobacco and certain other nonfood commodities.

Nonfood Commodities Which May Be Fumigated With PH3 ALP

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
Tires (for mosquito control)
Tobacco
Wood, cut trees, wood chips, wood and bamboo products
Paper and paper products
Dried plants and flowers
Seeds (such as grass seed, ornamental herbaceous plant seed and vegetable seed)
Other nonfood commodities

SECTION 8

EXPOSURE CONDITIONS FOR ALL FUMIGATIONS

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

Minimum Exposure Periods for PH3 ALP

Temperature	Pellets	Tablets
40°F (5°C)	Do not fumigate	Do not fumigate
40°-53°F (5-12°C)	8 days (192 hours)	10 days (240 hours)
54°-59°F (12-15°C)	4 days (96 hours)	5 days (120 hours)
60°-68°F (16-20°C)	3 days (72 hours)	4 days (96 hours)
above 68°F (20°C)	2 days (48 hours)	3 days (72 hours)
above 77°F (25°C)	---	---

The fumigation must be long enough so as to provide for adequate control of the insect pests that infest the commodity being treated. Additionally, the fumigation period should be long enough to allow for more or less complete reaction of PH3 ALP with moisture so that little or no unreacted aluminum phosphide remains. This will minimize worker exposures during further storage and/or processing of the treated bulk commodity as well as reduce hazards during the disposal of partially spent aluminum phosphide products remaining after space fumigations. The proper length of the fumigation period will vary with exposure conditions since, in general, insects are more difficult to control at lower temperatures, and the rate of phosphine gas production by PH3 ALP is lower at lower temperatures and humidities.

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 phosphine. Careful sealing is required to ensure that adequate gas levels are retained and proper application procedures must be followed to provide satisfactory distribution of phosphine gas. Application of additional PH3 ALP is recommended if the concentration of phosphine drops below an effective level. If reentry into the treated structure is required, follow the requirements for respiratory protection usage found in Section 11 of this Manual. 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 the 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 commodities contained in large storage areas.

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 PH3 ALP.

It is permissible and often desirable to use a low-flow recirculation system for phosphine gas in certain bulk storages. This method may be used in ship's holds, various types of flat storage and vertical storage bins. Recirculation usually involves the application of fumigant to the surface of the commodity. The phosphine gas is then continuously or intermittently drawn out of the over-space and blown into the bottom of the storage using specially designed low volume fans and duct work. This method facilitates the quick and uniform penetration of phosphine gas throughout the commodity. In some instances a reduced dosage may be used.

Please contact Douglas Products if assistance is required in designing recirculation systems.

SECTION 9

DOSAGE RATES

Dosage Rates

Phosphine 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 PH3 ALP is required to treat a 30,000-bushel silo whether it is empty or full of grain unless, of course, a tarpaulin seals off the surface of the commodity. The following dosage ranges are recommended for bulk (per 1,000 bushels) and space fumigations (per 1,000 cu. ft.):

9.1 MAXIMUM ALLOWABLE DOSAGE FOR FUMIGATION WITH PH3 ALP

Product	No. per 1,000 cu. ft.*	No. per 1,000 bu.*
Pellets	725	900
Tablets	145	180

*NOTE: The maximum dosage for dried fruits is 200 pellets, 40 tablets/1,000 cu. ft. (250 pellets, 50 tablets/1,000 bu.).

Maximum allowable dosage rate for rodent burrows is 10-20 pellets per burrow, 2-4 tablets per burrow.

Maximum allowable dosage rate for commodity in small containers is 1-2 pellets per 10 cu. ft.

The above dosages are 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 phosphine.

Somewhat higher dosages, not to exceed the maximum dosage, 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 phosphine 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 doses used for poorly constructed buildings that cannot be sealed adequately. In certain other fumigations, proper distribution of insecticidal 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 is added on top of the grain. In such cases, use of a low flow recirculation system is recommended under these circumstances. Please contact Douglas Products if assistance is required in designing the recirculation system.

9.2 PH3 ALP ADVISORY DOSAGE RATES FOR VARIOUS TYPES OF FUMIGATION

One (1) PH3 ALP Fumigant Tablet and five (5) Pellets will produce a concentration of 25 parts per million (ppm) of phosphine gas (PH_3) in a volume of 1,000 cu. ft. (1 g PH_3 /1,000 cu. ft. equivalent to 25 ppm).

Although it is permissible to use the maximum dosage listed in Section 9.2, the following table lists a range of dosages which can be used as a guideline for various types of fumigation.

The higher rate under conditions of severe infestation, lower temperature and other applicable variables.

Dosage Range

Type of Fumigation	No. of Pellets	No. of Tablets
1. Vertical Storages (such as silos, concrete bins, steel bins, tanks, etc.)	200-900/1,000 bu. 150-700/1,000 cu. ft.	40-80/1,000 bu. 30-140/1,000 cu. ft.
2. Farm Bins (Butler Type)	450-900/1,000 bu. 350-725/1,000 cu. ft.	90-180/1,000 bu. 70-145/1,000 cu. ft.
3. Bulk stored commodities in flat storage, bunkers and commodities stored on ground loosely piled under gas tight covering.	450-900/1,000 bu. 350-725/1,000 cu. ft.	90-180/1,000 bu. 70-145/1,000 cu. ft.
4. Packaged commodities (bagged grain, process foods, etc.) in sealable enclosures.	150-450/1,000 cu. ft.	30-90/1,000 cu. ft.
5. Nuts, dates or dried fruit in storage boxes.	100-200/1,000 cu. ft.	20-40/1,000 cu. ft.
6. Nuts, dates or dried fruit in bulk.	125-250/1,000 bu. 100-200/1,000 cu. ft.	25-50/1,000 bu. 20-40/1,000 cu. ft.
7. Railcars, containers, trucks, vans and other transport vehicles	225-500/1,000 cu. ft.	45-145/1,000 cu. ft.
8. Space fumigation such as cereal mills, feed mills, food processing plants & warehouses	100-300/1,000 cu. ft.	20-60/1,000 cu. ft.
9. Stored Tobacco	100-250/1,000 cu. ft.	20-50/1,000 cu. ft.
10. Non-food products	150-450/1,000 cu. ft.	30-90/1,000 cu. ft.
11. Stored beehives, supers and other beekeeping equipment for wax moth control and Africanized honeybees with tracheal mites and foulbrood.	150-225/1,000 cu. ft.	30-45/1,000 cu. ft.
12. Barges	300-900/1,000 bu. 250-725/1,000 cu. ft.	60-80/1,000 bu. 50-145/1,000 cu. ft.
13. Shipholds	200-400/1,000 bu. 150-330/1,000 cu. ft.	40-80/1,000 bu. 30-66/1,000 cu. ft.
14. Commodity in small containers	1-2 pellets per 1.4 to 10 cu. ft.	---
15. Rodent burrows	10-20 per burrow	2-4 per burrow

Use higher dosages 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 phosphine gas.

SECTION 10

PROTECTIVE CLOTHING

10.1 GLOVES

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

SECTION 11

RESPIRATORY PROTECTION

11.1 WHEN RESPIRATORY PROTECTION MUST BE WORN

Respiratory protection is required when concentration levels of phosphine are unknown or when concentrations exceed permissible exposure limits.

11.2 PERMISSIBLE GAS CONCENTRATION RANGES FOR RESPIRATORY PROTECTION DEVICES

A NIOSH approved air-purifying full face gas-mask with a chin style mounted canister approved for phosphine may be used at levels up to 15 ppm or following manufacturer's use conditions instructions for escape. Above 15 ppm or in situations where the phosphine concentration is unknown, a NIOSH approved, self-contained breathing apparatus (SCBA) must be worn. The NIOSH Pocket Guide to Chemical Hazards (Publication Number 2010-168c) or the NIOSH ALERT – Preventing Phosphine Poisoning and Explosions During Fumigation, lists these and other types of approved respirators and the concentration limits at which they may be used.

11.3 REQUIREMENTS FOR AVAILABILITY OF RESPIRATORY PROTECTION

If PH3 ALP is to be applied from within the structure to be fumigated, a NIOSH approved air-purifying full face gas-mask with a chin style mounted canister approved for phosphine or SCBA or its equivalent must be available at the site of application in case it is needed. Respiratory protection must also be available for applications from outside the area to be fumigated such as addition of tablets or pellets or automatic dispensing devices, outdoor applications, etc.

SECTION 12

REQUIREMENTS FOR CERTIFIED APPLICATOR'S PRESENCE AND TRAINING FOR RECEIPT OF IN-TRANSIT VEHICLES UNDER FUMIGATION

12.1 The requirements for the presence of a Certified Applicator and their responsibility for all workers are as follows:

1. A Certified Applicator must be physically present, responsible for, and maintain visual and/or voice contact with all fumigation workers during the opening of the container and 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.
2. 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.
3. 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 12.2 for training requirements.

12.2 Training requirements for receipt of in-transit vehicles under fumigation:

The trained person(s) must be trained by a Certified Applicator following the EPA accepted product applicator's 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:

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

OR

- b. How to transfer the commodity to another storage area without prior aeration and ensure that worker safety limits are not being exceeded during the transfer.
- c. How to determine when respiratory protection must be worn.
- d. How to protect workers and nearby persons from exposure to levels above the 8-hour time weighted average (TWA) of 0.3 ppm or the 15 minute TWA short-term exposure limit (STEL) of 1.0 ppm phosphine.
- e. Proper removal of placards from the vehicle.
- f. How to follow proper residual disposal instruction.

SECTION 13

GAS DETECTION EQUIPMENT

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

SECTION 14

NOTIFICATION REQUIREMENTS

14.1 AUTHORITIES AND ON-SITE WORKERS

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

14.2 INCIDENTS INVOLVING THESE PRODUCTS

Registrants must be informed of any incident involving the use of this product. Please call 1-800-223-3684 during normal work hours, central time and selection Option #1, so Douglas Products can report the incident to Federal and State Authorities.

14.3 THEFT OF PRODUCTS

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

SECTION 15

APPLICATOR AND WORKER EXPOSURE

Approved respiratory protection must be worn if concentrations exceed the allowable limits, or when concentrations are unknown.

15.1 EXPOSURE LIMITS

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

15.2 APPLICATION OF FUMIGANT

At least two persons, a certified applicator and trained person, or two trained persons under the direct supervision of the certified applicator must be present during fumigation of structures when entry into the structure for application of the fumigant is required. Depending upon temperature and humidity, PH3 ALP Tablets and Pellets release phosphine 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. Monitoring must be conducted to determine exposure limits and determine the applicator's exposure. See Section 11 for respiratory protection requirements.

15.3 LEAKAGE FROM FUMIGATED SITES

Phosphine 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 airflow in the occupied areas must be sufficient to bring down the phosphine concentration to a safe level of 0.3 ppm or below.

15.4 AERATION AND REENTRY

If the structure is to be entered after fumigation, it must be aerated until the level of phosphine 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 i.e., over industrial hygiene levels of phosphine. Do not allow reentry into treated structures by any person before the level of phosphine reaches 0.3 ppm or below unless protected by an approved respirator.

15.5 HANDLING UNAERATED COMMODITIES

Transfer of incompletely aerated commodity via bulk handling equipment such as augers, drag conveyors and conveyor belts to a new storage structure is permissible. A Certified Applicator is responsible for training workers who handle the transfer of incompletely aerated listed commodities, and appropriate measures must be taken (i.e., ventilation or respiratory protection) to prevent exposures from exceeding the exposure limits for phosphine. The new storage structure must be placarded if it contains more than 0.3 ppm phosphine. If the fumigation structure must be entered to complete the transfer, at least two trained persons, wearing proper respiratory protection may enter the structure. A certified applicator must be physically present during the entry into the structure.

REMEMBER transporting containers or vehicles under fumigation over public roads is prohibited.

15.6 INDUSTRIAL HYGIENE MONITORING

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

15.7 ENGINEERING CONTROLS AND WORK PRACTICES

If monitoring shows that workers may be exposed to concentrations in excess of the permitted limits, then engineering controls (such as forced air ventilation) and/or appropriate work practices must be used to reduce exposure to within permitted limits. Appropriate respiratory protection must be worn if phosphine exposure limits are exceeded or concentrations are unknown.

SECTION 16

PLACARDING OF FUMIGATED AREAS

All entrances to the fumigated structure must be placarded, including areas containing rodent burrows being fumigated. Placards must be made of substantial material that can be expected to withstand adverse weather conditions and must bear the wording as follows:

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

All entrances to a fumigated structure 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 phosphine or less. To determine whether aeration is complete, each fumigated structure or vehicle must be monitored and shown to contain 0.3 ppm or less phosphine gas in the air space around and, if feasible, in the mass of the commodity.

SECTION 17

SEALING OF STRUCTURES

The structure to be fumigated must first be inspected to determine if it can be made sufficiently gas tight. Careful sealing is required so that adequate gas levels are retained. Turn off all ventilation, supply air, air conditioning, and any other air moving systems which could negatively affect the fumigation. Thoroughly inspect the structure to be fumigated and seal cracks, holes and openings. These areas could include, but are not limited to: windows, doors, vents, chimneys, open pipes and structural flaws. Sealing techniques can vary, but most often include polyethylene sheeting, adhesive tapes and adhesive sprays. Expandable foam or caulking material can work well on structural flaws. Proper sealing will insure sufficient gas levels within the fumigated structure and will decrease the chance of unwanted exposures outside of the fumigated area.

As with all fumigations, it is required that sealing be inspected for leaks. If phosphine above 0.3 ppm is found in an area where exposure to workers or bystanders may occur, the fumigator,

using proper respiratory protection equipment must attempt to seal the leak from the exterior of the structure. Failing this, the fumigators, following proper procedures to prevent accidental poisoning, may enter the structure and seal the leaks from the interior. If the concentration inside the structure has decreased below the target level as a result of the leakage, additional fumigant may be added following the sealing repairs.

DO NOT FUMIGATE A STRUCTURE THAT CANNOT BE SEALED SUFFICIENTLY GAS-TIGHT.

SECTION 18

AERATION OF FUMIGATED COMMODITIES

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

18.1 FOODS AND FEEDS

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

18.2 NON-FOOD COMMODITIES

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

18.3 TOBACCO

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

SECTION 19

STORAGE INSTRUCTIONS

Store PH3 ALP Fumigant Tablets and Pellets in a dry, well-ventilated area away from heat, under lock and key. Post as a pesticide storage area. Do not store PH3 ALP products in areas where temperature may exceed 130°F. Do not store in buildings where humans or domestic animals may reside. Keep out of reach of children. PH3 ALP tablets and pellets are supplied in gas-tight, resealable aluminum flasks. Do not expose product to atmospheric moisture any longer than is necessary and seal tightly before returning flasks to storage.

Do not contaminate food, water or feed by storing pesticides in the same areas used to store these commodities.

19.1 LABELING OF STORAGE

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

1. Danger, Poison (with skull and cross bones)
2. Authorized Personnel Only
3. Pesticide Storage NFPA Hazard Identification Symbols

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

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

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

SECTION 20

TRANSPORTATION INSTRUCTIONS

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

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

20.2 TRANSPORTATION EXEMPTION

Transportation Special Permit: DOT-SP 13307

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 special permit with you during transportation.

For a copy of this special permit contact Douglas Products and Packaging Company at: (800) 223-3684 during normal work hours, central time and selection Option #1. Address: 1550 E Old 210 Highway, Liberty, MO 64068

SECTION 21

REQUIRED WRITTEN 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 and follow a Fumigation Management Plan (FMP). State, County, and local authorities may also have specific requirements. The FMP must be written PRIOR TO EVERY treatment including fumigation for burrowing pests. The FMP must address characterization of the site, and include appropriate monitoring and notification requirements, consistent with, but not limited to, the following:

1. The use of this product is strictly prohibited within 100 feet of any building where humans and/or domestic animals do or may reside on single and multi-family residential properties and nursing homes, schools (except athletic fields), daycare facilities and hospitals. For a list of approved sites see Section 22.
2. Inspect the structure and/or area to determine its suitability for fumigation.
3. When sealing is required, consult previous records for any changes to the structure, seal leaks, and monitor any occupied adjacent buildings.
4. Prior to each fumigation, review any existing FMP, SDS, Applicator's Manual and other relevant safety procedures with company officials and appropriate employees.
5. 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.
6. 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.
7. Consult with company officials to develop procedures for local authorities to notify nearby residents in the event of an emergency.
8. Confirm the placement of placards to secure entrance into any structure under fumigation.
9. Confirm the required safety equipment is in place and the necessary manpower is available to complete a safe effective fumigation.
10. Written notification must be provided to the receiver of a vehicle that is fumigated in transit.

These factors **must** be considered in putting together an FMP. It is important to note that some plans will be more comprehensive than others. All plans should reflect the experience and expertise of the applicator and circumstances at and around the site. In addition to the plan, the applicator must read the entire label and must follow its directions carefully and abide by all restrictions. If the applicator has any questions about the development of a FMP, contact Douglas Products for further assistance.

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

STEPS FOR PREPARATION OF THE REQUIRED WRITTEN FUMIGATION MANAGEMENT PLAN

21.1 PURPOSE

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

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

Before any fumigation begins, carefully read and review the complete label, which include the container label and the Applicator's Manual. This information must also be given to the appropriate company officials (supervisors, foreman, safety officer, etc.) in charge of the site. Preparation is the key to any successful fumigation. If you do not find specific instructions for the type of fumigation that you are to perform listed in this Guidance Document, you will want to construct a similar set of procedures using this document as your guide or contact Douglas Products for assistance. Finally, before any fumigation begins you must be familiar with and comply with all applicable federal, state and local laws. The success and future of fumigation are not only dependent on your ability to do your job but also by carefully following all rules, regulations, and procedures required by governmental agencies.

21.2 A CHECKLIST GUIDE FOR A FUMIGATION MANAGEMENT PLAN

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

A. PRELIMINARY PLANNING AND PREPARATION

1. Determine the purpose of the fumigation.
 - a. Elimination of insect infestation
 - b. Elimination of rodent infestation
 - c. Plant pest quarantine.
2. Determine the type of fumigation, for example
 - a. Space: tarp, mill, warehouse, food plant
 - b. Vehicle: railcar, truck, van, container
 - c. Commodity: raw agricultural or processed foods
 - d. Type of Storage: vertical silo, farm storage, flat storage
 - e. Vessels: ship or barge. In addition to the Applicator's Manual, read the US Coast Guard Regulations 46 CFR 147A.
 - f. Outdoor rodent burrows
3. Fully acquaint yourself with the site and commodity to be fumigated, including.
 - a. The general structure layout, construction (materials, design, age, maintenance) of the structure, fire or combustibility hazards, connecting structures and escape routes, above and below ground, and other unique hazards or structure characteristics. Prepare, with the owner/operator/person in charge. Draw or have a drawing or sketch of structure to be fumigated, delineating features, hazards, and other structural issues.
 - b. The number and identification of persons who routinely enter the area to be fumigated (i.e., employees, visitors, customers, etc.)
 - c. The specific commodity to be fumigated, its mode of storage, and its condition.
 - d. The previous treatment history of the commodity, if available.
 - e. Accessibility of utility service connections.
 - f. Nearest telephone or other means of communication, and mark the location of these items on the drawing/sketch.
 - g. Emergency shut-off stations for electricity water and gas. Mark the location of these items on the drawing/sketch.
 - h. Current emergency telephone numbers of local Health, Fire, Police, Hospital and Physician responders.
 - i. Name and phone number (both day and night) of appropriate company officials.
 - j. Check, mark and prepare the points of fumigation application locations if the job involves entry into the structure for fumigation.
 - k. Review entire label, which includes the container label and Applicator's Manual.
 - l. Exposure time considerations.
 1. Product (Tablet or Pellet) to be used.
 2. Minimum fumigation period, as defined and described in the use directions of the Applicator's Manual.
 3. Down time required to be available
 4. Aeration requirements
 5. Cleanup requirements, including dry or wet deactivation methods, equipment, and personnel needs, if necessary.

6. Measured and recorded commodity temperature and moisture.

m. Determination of dosage

1. Cubic footage or other appropriate space/location calculations.
2. Structure sealing capability and methods.
3. Maximum Allowable Dose Rates
4. Temperature, humidity, wind
5. Commodity/space volume
6. Past history of fumigation of structure
7. Exposure time.

B. PERSONNEL

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

C. MONITORING

1. Safety
 - a. Monitoring of phosphine conditions must be conducted in areas to prevent excessive exposure and to determine where exposure may occur. Document where monitoring will occur.
 - b. Keep a log or manual of monitoring records for each fumigation site. This log must at a minimum contain the timing, number of readings taken and level of concentrations found in each location.
 - c. When monitoring, document even if there is no phosphine present above the safe levels. In such cases, subsequent monitoring is not routinely required. However spot checks must be made occasionally, especially if conditions significantly change.
2. Efficacy
 - a. For stationary structures, phosphine readings MUST be taken from within the fumigated structure to insure proper gas concentrations. If the phosphine levels have fallen below the targeted level, the fumigators, following proper entry procedures may reenter the structure and add additional product.
 - b. All phosphine readings must be documented.

D. NOTIFICATION

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

3. Confirm that the receivers of in-transit vehicles under fumigation have been notified and are trained according to Section 12 of this applicator manual.

E. SEALING PROCEDURES

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

F. APPLICATION PROCEDURES AND FUMIGATION PERIOD

1. Plan carefully and apply the product in accordance with the label requirements.
2. When entering into the area under fumigation always work with two or more people under the direct supervision of a certified applicator wearing appropriate respirators.
3. Apply fumigant from the outside where appropriate.
4. Provide watchmen when entry into the fumigation site by unauthorized persons cannot otherwise be assured.
5. When entering structures always follow OSHA rules for confined spaces.
6. Document that the receiver of in-transit vehicles/containers under fumigation has been notified.
7. Turn off any electric lights in the fumigated area of the structure as well as all nonessential electrical motors.

G. POST-APPLICATION OPERATIONS

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

sensitive equipment containing copper or other metals likely to be corroded by phosphine gas.

1. Read the entire label, SDS and related safety material.
2. An appropriate Fumigation Management Plan must be developed for all Farm Bin applications.
3. Inspect the bin to determine if you can fumigate effectively.
4. If the bin is located in an area where nearby workers and/or bystanders or domestic animals would be exposed to phosphine gas because of leakage from the bin:
 - (i) Develop a monitoring procedure that will confirm if leakage from the bin is above the allowable limits in an area that would affect nearby workers or bystanders.
 - (ii) Advise local authorities when and where you will be fumigating. Provide and review with them the SDS, Applicator's Manual and other relevant safety information.
5. If the bin is in an isolated area on private property (i) and (ii) above are not required.
6. Seal the bin as tightly as possible. It is recommended that the surface of the grain be covered with polyethylene sheets after PH3 ALP has been applied. Tarping the grain surface will greatly reduce the leak rate of the gas as well as reduce the amount of PH3 ALP required. Only the volume below the tarp must be dosed. If not tarped, the entire volume of the storage must be treated, whether full or empty.
7. Using the Applicator's Manual, calculate the dosage of Tablets or Pellets to be applied based on type of structure, its sealing properties, content type, weather, commodity temperature and moisture content of the commodity and length of fumigation.
8. PH3 ALP Tablets and Pellets required for the fumigation may be scattered over the surface. Tablets and pellets can be probed into the grain using a rigid PVC pipe about 5 to 7 feet in length and having a diameter of 1-1/4 inches. Use about 20- 50 tablets or 100-250 pellets per probe. Probe the dosage uniformly over the surface.
9. Immediately cover the surface of the grain with a plastic tarpaulin.
10. Place no more than 25 percent of the total dose at the bottom if the bin is equipped with aeration fans. **Attention:** Make sure that the aeration duct is dry before adding PH3 ALP. Addition of PH3 ALP to water in an aeration duct may result in a fire.
11. Seal the aeration fan with 4-mil plastic sheeting.
12. Place placards on all entrances to the bin and near the ladder.
13. Following aeration of the bin, the surface of the grain may be sprayed with an approved protectant to discourage reinfestation.

Note: If monitoring equipment is not available, an approved canister respirator must be worn during application from within an enclosed area.

22.2 FLAT STORAGES

Treatment of these types of storages often requires considerable time and physical effort. Therefore, sufficient manpower should be available to complete the work rapidly enough to prevent excessive exposure to phosphine gas. Vent flasks (tablets and pellets) outside the storage, conduct fumigations during cooler periods, and employ other work practices to minimize exposures. It is likely that respiratory protection will be required during application of fumigant to flat storages. Refer to Sections on Applicator and Worker Exposure and Respiratory Protection.

1. Inspect the site to determine its suitability for fumigation.
2. Determine if the structure is in an area where leakage during fumigation or aeration would adversely affect nearby workers

SECTION 22

APPLICATION PROCEDURES

An FMP MUST BE WRITTEN PRIOR to all applications.

An FMP must be devised to cover application and exposure period, aeration and disposal of the fumigant so as to keep to a minimum any human exposures to phosphine and to help assure adequate control of the insect pests.

22.1 FARM BINS

Leakage is the single most important cause of failures in the treatment of farm storages. Since these storages are often small, they usually have a higher leakage area in proportion to their capacity. Most wooden storage structures are so porous that they cannot be successfully fumigated unless they are completely tarped. Do not fumigate a storage that will be entered by humans or animals prior to aeration. Do not fumigate areas which house

or bystanders if concentrations were above the permitted exposure levels.

3. Develop an appropriate Fumigation Management Plan. (Refer to FMP guidelines.)
4. Consult previous records for any changes to the structure. Seal vents, cracks and other sources of leaks.
5. Using the Applicator's Manual, determine the length of the fumigation and calculate the dosage of tablets or pellets to be applied based upon volume of the building, contents, air and/or commodity temperature and the general tightness of the structure.
6. Apply tablets or pellets by surface application. Tablets and pellets may be applied by shallow probing, deep probing or uniform addition as the bin is filled.
Storages requiring more than 24 hours to fill should not be treated by addition of fumigant to the commodity stream as large quantities of phosphine may escape before the flat storage is completely sealed.
Probes should be inserted vertically at intervals along the length and width of the flat storage. Pellets or tablets may be dropped into the probe at intervals as it is withdrawn.
Surface application may be used if the bin can be made sufficiently gas tight to contain the fumigant gas long enough for it to penetrate the commodity. In this instance, it is advisable to place about 25 percent of the dosage in the floor level aeration ducts. Check the ducts prior to addition of PH3 ALP to make sure that they contain no liquid water.
7. Placement of plastic tarp over the surface of the commodity is often advisable, particularly if the overhead of the storage cannot be well sealed.
8. Lock all entrances to the storage and post fumigation warning placards.

22.3 VERTICAL STORAGES (concrete upright bins and other silos in which grain can be rapidly transferred)

1. Inspect the site to determine its suitability for fumigation.
2. Determine if the structure is in an area where leakage during fumigation or aeration would expose nearby workers or bystanders to concentrations above the permitted levels.
3. Develop an appropriate Fumigation Management Plan (Refer to FMP guidelines).
4. Consult previous records for any changes to the structure. Close openings and seal cracks to make the structure as airtight as possible. Prior to the fumigation, seal the vents near the bin top which connect to adjacent bins.
5. Determine the length of the fumigation and calculate the dosage of Tablets or Pellets to be applied based upon volume of the building, air and/or commodity temperature and the general tightness of the structure.
6. Pellets and Tablets may be applied continuously by hand or by an automatic dispenser on the headhouse/gallery belt or into the fill opening as the commodity is loaded into the bin. An automatic dispenser may also be used to add PH3 ALP tablets and pellets into the commodity stream in the up leg of the elevator.
7. Seal the bin deck openings after the fumigation has been completed.
8. Bins requiring more than 24 hours to fill should not be fumigated by continuous addition into the commodity stream. These bins may be fumigated by probing, surface application, or other appropriate means. Exposure periods should be lengthened to allow for diffusion of gas to all parts of the bin if PH3 ALP has not been applied uniformly throughout the commodity mass.
9. Place warning placards on the discharge gate and on all entrances.

22.4 MILLS, FOOD PROCESSING PLANTS AND WAREHOUSES

1. Inspect the site to determine its suitability for fumigation.
2. Determine if the structure is in an area where leakage during fumigation or aeration would expose nearby workers or bystanders if concentrations were above the permitted exposure levels.
3. Develop an appropriate Fumigation Management Plan. (Refer to Steps for Preparation of a Fumigation Management Plan.)
4. Determine the length of the fumigation and calculate the dosage of tablets or pellets to be applied based upon volume of the building, air and/or commodity temperature and the general tightness of the structure.
5. Read the directions found under Section 4.3 Physical and Chemical Hazards and remove or cover any of the listed items that can become damaged from exposure to phosphine gas.
6. Consult previous records for any changes in the structure. Carefully seal and placard the space to be fumigated.
7. Place trays or sheets of Kraft paper or foil, up to 12-sq. ft. (1.1 sq. M) in area, on the floor throughout the structure.
8. Spread PH3 ALP on the sheets at a density no greater than 30 tablets per sq. ft. or 150 pellets per sq. ft. This corresponds to slightly more than 3/4ths of a flask containing 2500 tablets or 3/4ths of a flask containing 1600 pellets per 3'x4' sheet. Check to see that PH3 ALP has not piled up and that it is spread out evenly to minimize contact between the individual tablets or pellets.
9. Turn off any lights within the treated area and shut off all electrical motors not essential to operations of the storage. Doors leading to the fumigated space must be closed, sealed, and placarded with warning signs.
10. Upon completion of the exposure period, open windows, doors, vents, etc., allow the fumigated structure to aerate. Do not enter the structure without proper Personal Protective Equipment (PPE) unless gas readings have been taken and the concentration is below the allowable limits. Gas concentration readings may be taken using low level detector tubes or similar devices to ensure safety of personnel who reenter the treated area.
11. Collect the spent PH3 ALP dust and dispose of it, with or without further deactivation. Refer to Disposal Instructions in Section 24 of this Manual.
12. Remove fumigation warning placards from the aerated structure.

22.5 RAILCARS, CONTAINERS, TRUCKS, VANS, AND OTHER TRANSPORT VEHICLES

Develop an appropriate Fumigation Management Plan.

Railcars and containers, trucks, vans, and other transport vehicles shipped piggyback by rail may be fumigated in transit. However, the aeration of railcars, railroad boxcars, containers, and other vehicles is prohibited en-route. It is not legal to move trucks, trailers, containers, vans, etc. over public roads or highways until they have been aerated.

Do NOT USE PH3 ALP tablets, pellets in cars or other personal vehicles.

Transport vehicles loaded with bulk commodities to which PH3 ALP Tablets, Pellets may be added directly are treated in essentially the same way as any other flat storage facility. PH3 ALP may be added as the vehicle is being filled. The dose may be scattered over the surface after loading has been completed or the tablets or pellets may be probed below the surface. Carefully seal any vents, cracks or other leaks, particularly if the fumigation is to be carried out in transit. See Section 16 of this Applicator's Manual for recommendations on placarding.

The Shipper and/or fumigator must provide written notification to the receiver of railcars, railroad boxcars, shipping containers, and other vehicles which have been fumigated in transit. A copy of the Applicator's Manual must precede or accompany all transportation containers or vehicles which are fumigated in transit. If the Applicator's Manual is sent with the transport vehicle it must be placed securely on the outside of the vehicle. Proper handling of treated railcars at their destination is the responsibility of the consignee. Upon receipt of the railcar, railroad boxcars, shipping containers and other vehicles, a certified applicator and/or persons with documented authorized training must supervise the aeration process and removal of the placards.

22.6 TARPULIN AND BUNKER FUMIGATIONS

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. Polyethylene (poly) tarps are penetrated only very slowly by phosphine 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.

1. Develop an enclosure suitable for fumigation by covering bulk or packaged commodities 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, the commodity to be fumigated 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.
2. Determine if the enclosure is in an area where leakage during fumigation or aeration would affect nearby workers or bystanders.
3. Develop an appropriate Fumigant Management Plan. (Refer to Section 21 Fumigation Management Plan.)

4. Using the guidance given under Section 8 Exposure Conditions, determine the length of the fumigation and calculate the dosage of tablets or pellets to be applied based upon volume of the space under the tarp, air and commodity temperature.
5. Tablets and Pellets 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 amounts of PH3 ALP at any one point. The PH3 ALP should be added 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 and to prevent the introduction of water from rain. Care should be taken to see that the poly is not allowed to cover the PH3 ALP and prevent contact with moist air or confine the gas.
6. Distribution of phosphine 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.
7. Place warning placards at conspicuous points on the enclosure.

22.7 IN-TRANSIT SHIPHOLDS

22.7.1 General Information

Important – In-transit ship or shiphold fumigation is also governed by U.S. Coast Guard Regulation 46 CFR 147A, Interim Regulations for Shipboard Fumigation. Refer to this regulation prior to fumigation. For further information contact:

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

22.7.2 Pre-Voyage Fumigation Procedures – A FMP must be written for all fumigations PRIOR TO ACTUAL TREATMENT.

1. Prior to fumigating a vessel for in-transit cargo fumigation, the master of the vessel, or his representative, and the certified applicator 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 the master of the vessel and the certified applicator has made a determination that the vessel is safe for occupancy.
2. The certified applicator 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.
**Note: Personal protection equipment means a NIOSH approved air-purifying full face gas-mask with a chin style mounted canister approved for phosphine may be used at levels up to 15 ppm or following manufacturer's use conditions instructions for escape. Above 15 ppm or in situations where the phosphine concentration is unknown, a NIOSH approved, self-contained breathing apparatus (SCBA) must be worn.*
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. Using the label, determine the length of the fumigation and calculate the dosage of tablets or pellets to be applied based upon volume of the vessel, air and/or commodity temperature and the general tightness of the vessel.
5. Placard all entrances to the treated spaces with fumigation warning signs.
6. 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.
7. During the fumigation, or until a manned vessel leaves port or the cargo is aerated, the certified applicator shall ensure that a qualified person using phosphine gas detection equipment tests spaces adjacent to areas containing fumigated cargo as well as 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.

8. Review with the master, or his representative, the precautions and procedures to follow during the voyage of a shiphold in-transit fumigation.

22.7.3 Application Procedures for Bulk Dry Cargo Vessels and Tankers

1. Apply tablets or pellets by scattering uniformly over the commodity surface, or they may be shallow or deep probed into the commodity mass.
2. Immediately after application of the fumigant, close and secure all hatch covers, tank tops, butterworth valves, manways, etc.

22.7.4 In-transit Fumigation of Transport Units (Containers) Aboard Ships

In-transit fumigation of transport units on ships is also governed by DOT RSPA 49 CFR 176.76(h) Transport Vehicles, Freight Containers, and Portable Tanks Containing Hazardous Materials and International Maritime Dangerous Goods Code P9025-1 Amdt. 27-94. Application procedures for fumigation of raw commodities or processed foods in transport units (containers) are described in Section 22.5 of this Manual.

22.7.5 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.

22.7.6 Precautions and Procedures During Discharge

If necessary to enter holds prior to discharge, test spaces directly above grain 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.

22.7.7 Barges

Barge fumigation is 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 Division GMSO-3
Washington, DC 20593-0001

Leaks are a common cause of failures in the treatment of commodities aboard barges. Carefully inspect all hatch covers prior to application of PH3 ALP and seal, if necessary. Placard the barge. Notify consignee if the barge is to be fumigated in-transit and provide safety instructions for receipt and unloading.

22.8 SMALL SEALABLE ENCLOSURES

Develop an appropriate Fumigation Management Plan.

Excellent results may be attained in the treatment of small enclosures 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 PH3 ALP pellet will treat a space of 1.4 to 10 cubic feet. A single PH3 ALP tablet will treat a space of 6.9 to 50 cubic feet.

22.9 BEEHIVES, SUPERS AND OTHER BEE KEEPING EQUIPMENT

Develop an appropriate Fumigation Management Plan.

PH3 ALP Tablets and Pellets may be used for the control of the Greater Wax Moth in stored beehives, supers, and other bee keeping equipment and for the destruction of bees, Africanized bees, and diseased bees including those infested with tracheal mites and foulbrood. The recommended dosage for this use is 30-45 tablets or 150-225 pellets per 1,000 cu. ft.

Fumigations may be performed in chambers at atmospheric pressure, under tarpaulins, etc., by placing the tablets or pellets onto trays or into moisture permeable envelopes. Do not add more than 2 tablets or 10 pellets onto trays or into each envelope. Honey from treated hives or supers may only be used for bee food.

22.10 BURROWING PEST CONTROL

A Fumigation Management Plan must be written for all burrowing pest fumigations.

22.10.1 Use Restrictions

THE USE OF THIS PRODUCT IS STRICTLY PROHIBITED WITHIN 100 FEET OF ANY BUILDING WHERE HUMANS AND/OR DOMESTIC ANIMALS DO OR MAY RESIDE ON SINGLE AND MULTI-FAMILY RESIDENTIAL PROPERTIES AND NURSING HOMES, SCHOOLS (EXCEPT ATHLETIC FIELDS), DAYCARE FACILITIES AND HOSPITALS.

This product must be applied to underground burrow systems located in noncrop areas, crop areas, or orchards occupied by woodchucks, yellowbelly marmots (rockchucks), prairie dogs (except Utah prairie dogs, *Cynomys Parvidens*), roof rats, mice, ground squirrels, moles, voles, pocket gophers or chipmunks.

All treatments for control of these species in burrows must be made outdoors. Pellets or tablets must be applied directly to underground burrow systems. Before using PH3 ALP tablets or pellets for burrowing pest control, read the applicable restrictions under Environmental Hazards and Endangered Species below.

This product must be used out of doors only for control of burrowing pests on agricultural areas, orchards, non-crop areas (such as pasture and rangeland), golf courses, athletic fields, airports, cemeteries, rights-of-way, earthen dams, parks and recreational areas and other non-residential, institutional or industrial sites and on residential or other commercial properties in accordance with the following directions:

1. THE USE OF THIS PRODUCT IS STRICTLY PROHIBITED WITHIN 100 FEET OF ANY BUILDING WHERE HUMANS AND/OR DOMESTIC ANIMALS DO OR MAY RESIDE ON SINGLE AND MULTI-FAMILY RESIDENTIAL PROPERTIES AND NURSING HOMES, SCHOOLS (EXCEPT ATHLETIC FIELDS), DAYCARE FACILITIES AND HOSPITALS.
2. For all other structures that are located in excess of 100 feet from the buildings listed above, including tool sheds, storage sheds or similar uninhabited structures, do not apply this product to a rodent burrow system within 25 feet of these structures.
3. When this product is used in athletic fields or parks, the applicator shall post a sign at the entrances to the treated site containing the signal word DANGER/PELIGRO skull and crossbones, the words: DONOTENTER/NOENTRE, FIELDNOTFORUSE, the name and EPA registration number of the fumigant. The sign must state a 24-hour emergency response number and the contact number of the certified applicator responsible for the application. Sign must be no smaller than 9 inches by 11 inches and must stand 18 inches high from the ground. Signs must be made of substantial material that can be expected to withstand adverse weather conditions and all information must be legible. Sign should remain posted for a minimum of 2 days after the final treatment and may be removed by the certified applicator or the contracting party.
4. When this product is used out of doors to a site other than an athletic field or park, the applicator shall post a sign at the application site containing the signal word DANGER/PELIGRO skull and crossbones, the name and EPA registration number of the fumigant. The sign must state a 24-hour emergency response number and the contact number of the certified applicator responsible for the application. Signs must be no smaller than 9 inches by 11 inches and must stand at least 18 inches high from the ground. Signs must be made of substantial material that can be expected to withstand adverse weather conditions and all information must be legible. Signs should remain posted for a minimum of 2 days after the final treatment and may be removed by the certified applicator or contracting party.

DO NOT TREAT ANY BURROWS THAT OPEN UNDER OR INTO OCCUPIED BUILDINGS. In addition, check for any other source through which the gas may enter into occupied buildings as a result of application to burrows. If there is any way gas can move through pipes, conduits, etc. from burrows, do not treat these burrows.

Prior to treating a rodent burrow the applicator must provide the customer with a copy of the Fumigation Management Plan.

22.10.2 Application Directions for Control of Burrowing Pests For use by a certified applicator or person under the direct supervision and who have been trained specifically for use of this product in burrowing pest control.

Use application procedures appropriate to the type of burrow system being treated. DOSAGE RATES MUST NOT BE EXCEEDED UNDER ANY CIRCUMSTANCES.

1. For species with open burrow systems, locate all entrances to each burrow system. Treatment of more than one entrance in a system is often desirable as systems often overlap and are not defined. Treat all entrances except for those entrances you are sure connect to already treated entrances. Insert 2 to

4 tablets or 10 to 20 pellets into each burrow entrance to be treated. Use the lower rates for smaller burrows and/or when soil moisture is high. Use the higher rates for larger burrow systems and when soil moisture is relatively low. Pack the treated entrance with crumpled paper and shovel soil to cover the paper. Using crumpled paper will prevent soil from covering the tablets or pellets and slowing down their action. Rocks, clods of soil, cardboard, etc. may be used for this purpose. Be sure to seal all untreated entrances by shoveling and packing soil and/or sod to completely seal the opening. Inspect treated areas 1 or 2 days following treatment for signs of residual activity of target species. Treat all reopened burrow openings in the manner prescribed above.

THE USE OF THIS PRODUCT IS STRICTLY PROHIBITED WITHIN 100 FEET OF ANY BUILDING WHERE HUMANS AND/OR DOMESTIC ANIMALS DO OR MAY RESIDE ON SINGLE AND MULTI-FAMILY RESIDENTIAL PROPERTIES AND NURSING HOMES, SCHOOLS (EXCEPT ATHLETIC FIELDS), DAYCARE FACILITIES AND HOSPITALS.

2. **For species with closed burrow systems**, (pocket gophers and moles in some situations). Locate the main underground runway by probing with a smooth-sided rod 12 to 18 inches from a fresh mound. For pocket gophers, begin probing on the flat side of the mound. A sudden reduction in soil resistance to the probe indicates that the main runway has been located. Once the main runway is located, remove the probe and apply 2 to 4 tablets or 10 to 20 pellets through the probe hole. Adjust treatment rate according to the level of soil moisture, using more pellets or tablets if the soil is relatively dry. Do not treat if soil is extremely dry or if there are no signs of recent gopher or mole activity. Make a tight seal to close probe hole by using a clod of soil or a sod plug to cover the hole or by using the heel of your shoe to push sod and/or soil over the surface opening. If the probe hole is more than one inch in diameter, place crumpled paper in the hole before closing it with soil and/or sod. Two days after treatment, you may check area for residual pest activity by poking holes in main runways of burrow systems, flagging holes and inspecting them two days later. You should retreat all reclosed burrow openings, on both sides of the plug.

THE USE OF THIS PRODUCT IS STRICTLY PROHIBITED WITHIN 100 FEET OF ANY BUILDING WHERE HUMANS AND/OR DOMESTIC ANIMALS DO OR MAY RESIDE ON SINGLE AND MULTI-FAMILY RESIDENTIAL PROPERTIES AND NURSING HOMES, SCHOOLS (EXCEPT ATHLETIC FIELDS), DAYCARE FACILITIES AND HOSPITALS.

SECTION 23

ENDANGERED SPECIES RESTRICTIONS

The use of PH3 ALP in a manner that may kill or otherwise harm an endangered or threatened species or adversely modify their habitat is a violation of Federal laws. This product is toxic to wildlife. Many non-target organisms exposed to phosphine gas in burrows will be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water by cleaning of equipment or disposal of wastes. Before using this pesticide on range and/or pastureland you must obtain the PESTICIDE USE BULLETIN FOR PROTECTION OF ENDANGERED SPECIES for the area in which the product is to be used. The bulletin is available from your County Extension Agent, State Fish and Game Office, or your pesticide dealer. Use of this product in a manner inconsistent with the PESTICIDE USE BULLETIN FOR PROTECTION OF ENDANGERED SPECIES is a violation of Federal laws.

Even if applicable county bulletins do not prohibit the use of this product at the intended site of application, you may not use this product for control of prairie dogs in the states of Arizona, Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah or Wyoming unless a pre-control survey has been conducted. Contact the nearest U.S. Fish and Wildlife Service Endangered Species Specialist to determine survey requirements in your area. This survey must be in compliance with the Black-Footed Ferret Survey Guidelines, developed by the U.S. Fish and Wildlife Service, and a determination must be made in accordance with the Guidelines that black-footed ferrets are not present in the treatment area.

CALIFORNIA (all endangered species)

Fresno, Inyo, Kern, Kings, Madera, Merced, Monterey, San Benito, San Luis Obispo, Santa Barbara, Stanislaus and Tulare See the U.S. EPA Interim Measures Bulletin for your county. To obtain a copy of the bulletin, contact your county agricultural commissioner or visit the following website: <http://www.cdpr.ca.gov/docs/es/index.htm>. If there is no current bulletin available for your county, contact the U.S. Fish and Wildlife Service office in Portland, OR to determine whether there are endangered species that might be adversely affected by your proposed use of PH3 ALP and the steps you should take to mitigate any such risks.

FLORIDA

Statewide

GEORGIA

Appling, Atkinson, Bacon, Baker, Ben Hill, Bleckley, Berrien, Brantley, Brooks, Bryan, Bullock, Calhoun, Camden, Chandler, Charlton, Chatham, Clinch, Coffee, Colquitt, Cook, Crisp, Decatur, Dodge, Dooly, Dougherty, Early, Echols, Effingham, Emanuel, Evans, Glynn, Grady, Irwin, Jeff Davis, Jenkins, Johnson, Lanier, Laurens, Lee, Liberty, Long, Lowndes, Macon, McClintosh, Miller, Mitchell, Montgomery, Pierce, Pulaski, Screven, Seminole, Telfair, Tattnall, Thomas, Tift, Toombs, Treutlen, Turner, Ware, Wayne, Wheeler, Wilcox and Worth.

NEW MEXICO

Hidalgo

UTAH

Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne

WYOMING

Albany

Special Local Restrictions

1. NORTH CAROLINA

PH3 ALP Tablets and Pellets may only be used for control of rats in the State of North Carolina. Use against other burrowing (not insect pests) pests is not permitted.

2. OKLAHOMA

A special permit for black-tailed prairie dog control by poisoning is required in Oklahoma. Contact the Oklahoma State Department of Wildlife Conservation to obtain this permit.

3. WISCONSIN

A state permit is required for use of pesticides in Wisconsin to control small mammals, except rats. Contact your local Department of Natural Resources office for information.

4. INDIANA

Use of PH3 ALP Tablets or Pellets for mole control is not legal in the State of Indiana.

5. MISSOURI

A state permit is required for use of pesticides in Missouri to control small mammals, except rats. Please contact the Missouri Department of Conservation for information.

6. KANSAS

A special permit for black-tailed prairie dog control by poisoning is required in Kansas. Contact the Kansas Fish and Game Commission to obtain this permit.

7. CALIFORNIA

Use of PH3 ALP Tablets and Pellets for chipmunk control is not legal in the State of California.

SECTION 24

DISPOSAL INSTRUCTIONS

24.1 GENERAL

Do not contaminate water, food or feed by storage or disposal. Unreacted or partially reacted PH3 ALP 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 the Applicator's Manual instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. For specific instructions, see Disposal Instructions (Section 24) and the Spill and Leak Procedures (Section 25) of this Manual. Some local and state waste disposal regulations may vary therefore disposal procedures must 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.

24.2 DISPOSAL

Non-refillable containers. Do not reuse or refill this container. Offer for recycling if available.

ALUMINUM FLASKS (tablets/pellets)

Triple rinse container (or equivalent) promptly after emptying. Triple rinse flasks and stoppers with water as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available or offer for reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Rinsate may be disposed of in a sanitary landfill, by pouring it out onto the ground or by other approved procedures. It is permissible to remove lids and expose empty flasks to atmospheric conditions until residue in the flask is reacted. Then puncture and dispose of in a sanitary landfill or other approved site, or by other procedures approved by state and local authorities.

If properly exposed the residual dust remaining after fumigation with PH3 ALP Tablet or Pellets will be a grayish-white powder and contain only a small amount of unreacted aluminum phosphide. However, residual dust from incompletely exposed PH3 ALP Tablets or Pellets may require special care.

24.3 DIRECTIONS FOR DISPOSAL OF RESIDUAL DUST FROM PH3 ALP – PELLETS AND TABLETS

If properly exposed, the residual dust remaining after a fumigation with PH3 ALP will be a grayish-white powder. This will be a nonhazardous waste and contain only a small amount of unreacted aluminum phosphide. However, residual dust from incompletely exposed PH3 ALP, (so called green dust) requires special care. Confinement of partially spent residual dust (as in a closed container) or collection and storage of large quantities of dust may

result in a fire hazard. Small amounts of phosphine may be given off from unreacted aluminum phosphide, and confinement of the gas may result in a flash.

In open areas, small amounts of residual dust, up to about 5 to 8 kg may be disposed of on site by burial or by spreading over the land surface away from inhabited buildings.

Spent residual dust from PH3 ALP may also 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. "Green dust" must be further deactivated before disposal at a landfill.

From 2 to 3 kg (4 to 7 lbs.) of spent dust from 2 to 3 flasks of PH3 ALP may be collected for disposal in a 1-gallon bucket. Larger amounts, up to about one-half case, may be collected in burlap, cotton or other types of porous cloth bags for transportation in an open vehicle to the disposal site. Do not collect dust from more than 7 flasks of tablets or 10 flasks of pellets (about 11 kg or 25 lbs.) in a single bag. Do not pile cloth bags together. Do not use this method for partially spent or "green" dust.

Attention: Do not collect dust in large drums, dumpsters, plastic bags or other containers where confinement may occur.

24.4 DIRECTIONS FOR DEACTIVATION OF PARTIALLY SPENT RESIDUAL DUST FROM PH3 ALP – PELLETS AND TABLETS

Partially spent dust must be deactivated further prior to ultimate disposal. This is especially true in cases of incomplete exposure that has resulted in so-called "green dust" or following a fumigation that has produced large quantities of partially spent material.

Attention: Wear a NIOSH approved air-purifying full face gas mask with a chin style mounted canister approved for phosphine or exposed to levels between 0.3 ppm to 15 ppm or a Self Contained Breathing Apparatus (SCBA) if exposure is unknown or above 15 ppm during wet deactivation of partially spent material.

Do not cover the container being used for wet deactivation.

Do not dispose of dust in a toilet.

Residual dust from PH3 ALP Tablets and Pellets may be deactivated as follows using the "Wet Method."

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) of detergent is suggested. The container should be filled with deactivating solution to within a few inches of the top.
2. Residual dust is poured slowly into the deactivating solution and stirred so as to thoroughly wet all of the particles. This should be done in the open air and not in the fumigated structure. Do not cover the container being used for wet deactivation. Dust from PH3 ALP Tablets or Pellets should be mixed into no less than about 10 gallons of water-detergent solution for each case of material used. Wear appropriate respiratory protection during wet deactivation of partially spent dust.
3. Dispose of the deactivated dust-water suspension, with or without preliminary decanting, at a sanitary landfill or other suitable site approved by local authorities. Where permissible, the slurry may be poured out onto the ground. If the slurry has been held for 36 hours or more, it may be poured into a storm sewer.

Residual dust from PH3 ALP Tablets and Pellets may also be deactivated as follows using the “Dry Method.”

1. Extension of the fumigation period is the simplest method for further deactivation of “green” or partially spent dust prior to ultimate disposal.
2. Small amounts of partially spent dust, from 2 to 3 kg (4 to 7 lbs.) may be further deactivated by storage in a 1-gallon bucket. Larger amounts of dust (about 11 kg or 25 lbs.) may be held for deactivation in porous cloth bags (burlap, cotton, etc.). Attention: Transport these bags in open vehicles. Do not pile up the bags. Do not store “green dust” in bags.

SECTION 25

SPILL AND LEAK PROCEDURES

25.1 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 approved respiratory protection may be worn if the concentration is known to be less than or equal to 15 ppm. See Section 11 for respiratory protection requirements. Do not use water at any time to clean up a spill of PH3 ALP product. Water in contact with unreacted PH3 ALP product will greatly accelerate the production of hydrogen phosphide gas which could result in a toxic and/or fire hazard. Wear gloves of cotton or other material when handling aluminum phosphide.

ALUMINUM FLASKS (tablets/pellets)

Return all intact aluminum flasks to cardboard case or other suitable packaging which has been properly marked according to DOT regulations. Notify consignee and shipper of damaged cases.

If aluminum flasks have been punctured or damaged so as to leak, the container may be temporarily repaired with aluminum tape or the PH3 ALP product may be transferred from the damaged flask to a sound metal container which should be sealed and properly labeled as aluminum phosphide. Transport the damaged containers to an area suitable for pesticide storage for inspection. Further instructions and recommendations may be obtained, if required, from Douglas Products or from your distributor.

Never place tablets, pellets, or dust in a closed container such as a dumpster, sealed drum, plastic bag, etc., as flammable concentrations and a flash of phosphine gas are likely to develop.

If a spill has occurred which is only a few minutes old, collect the tablets and pellets and place them back into the original flasks, if they are intact, and stopper tightly. Place the collected tablets and pellets in a sound metal container if the original flasks are damaged. **Attention:** These flasks may flash upon opening at some later time.

If the age of the spill is unknown or if the Tablets or Pellets have been contaminated with soil, debris, water, etc., gather up the spillage and place it into small open buckets having a capacity no larger than about 1 gallon. Do not add more than about one flask of spilled material, 1 to 1.5 kg (2 to 3 lbs.), to the bucket. If on-site, wet deactivation is not feasible, these open containers should be transported in open vehicles to a suitable area. Wet deactivation may then be carried out as described in Sections 24.4 and 24.5 of this Manual. Alternatively, small amounts of spillage from 4 to 5 flasks (4 to 8 kg, 9 to 18 lbs.) may be spread out in an open area away from inhabited buildings to be

deactivated by atmospheric moisture.

25.2 DIRECTIONS FOR DEACTIVATION BY WET METHOD

Attention: Wear a NIOSH approved air-purifying full face gas mask with a chin style mounted canister approved for phosphine or exposed to levels between 0.3 ppm to 15 ppm or a Self Contained Breathing Apparatus (SCBA) if exposure is unknown or above 15 ppm during wet deactivation of partially spent material.

Do not cover the container being used for wet deactivation.

Do not dispose of dust in a toilet.

If the contaminated material is not to be held until completely reacted by exposure to atmospheric moisture, deactivate the Tablets and Pellets by the “Wet Method” as follows:

1. Deactivating solution is prepared by adding 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.
2. The Tablets or Pellets should be poured slowly into the deactivating solution and stirred so as to thoroughly wet all of the PH3 ALP. This should be done in the open air. Do not cover the container being used for wet deactivation. PH3 ALP Tablets or Pellets should be mixed into no less than about 15 gallons of water-detergent solution for each case of material. Wear appropriate respiratory protection during wet deactivation.
3. Allow the mixture to stand, with occasional stirring, for about 36 hours. The resultant slurry will then be safe for disposal. Dispose of the slurry of deactivated material, with or without preliminary decanting, at a sanitary landfill or other suitable site approved by local authorities. Where permissible, this slurry may be poured into a storm sewer or out onto the ground.

**FOR CHEMICAL EMERGENCY, SPILL,
LEAK, FIRE, EXPOSURE OR ACCIDENT
CALL 1-844-845-3129**

**IMPORTANT INFORMATION
READ BEFORE USING PRODUCT**

WARRANTY – CONDITIONS OF SALE

OUR DIRECTIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

Made in India

EPA Approved: Jan. 14, 2021; Printed: Dec. 21, 2021

70506-13-1015,70506-14-1015 (082912-4371)