



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 28, 2024

Subject: Required Label Changes based on the January 31, 2024, National Marine Fisheries Service (NMFS) Biological Opinion (BiOp) on methomyl.

Upon issuance of the Methomyl NMFS BiOps, EPA notified registrants of the necessary label changes to be consistent with this BiOp. The following documents are generic copies of letters and associated tables of label amendments sent to methomyl registrants in February 2024. In addition, below is a listing of the methomyl technical and end-use product registrants receiving these letters. See EPA's Pesticide Product and Label System¹ to view the labels. Consistent with 40 CFR 152.130(c) and EPA's registration review actions, pesticide registrants may continue to distribute or sell these products under the previously approved labeling for 12 months from the date of EPA's approval of the amended labeling.

Methomyl technical product registrants:

Tessenderlo Kerley, Inc.

Albaugh, LLC

Sinon Corporation

Methomyl end-use product registrants:

Tessenderlo Kerley, Inc.

Albaugh, LLC

Sinon USA, Inc.

Wellmark International

Denka Registrations BV

Axion Ag Products, LLC

Glades Formulating Corporation

¹ <https://ordspub.epa.gov/ords/pesticides/f?p=PPLS:1>



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

VIA E-MAIL, RETURN RECEIPT REQUESTED

February 28, 2024

Subject: Technical label changes necessary to comply with the January 31, 2024, National Marine Fisheries Services' (NMFS) Biological Opinion on the effects of the following pesticide on federally-listed endangered and threatened (listed) species: Methomyl

Dear Sir or Madam:

You are receiving this letter because your company holds active technical registrations for methomyl products and those labels must be amended consistent with the NMFS Biological Opinion (BiOp) on the effects of methomyl on federally-listed endangered and threatened (listed) species. The BiOp may be found on the NMFS's website.²

As is common practice in nationwide pesticide consultations, the methomyl technical registrants, including your company, were included in the NMFS' consultation process. During the consultation, the technical registrants committed to amend their technical and end use methomyl product labels and registrations so that these measures could be incorporated into the Methomyl BiOp Description of the Action and considered by NMFS. With these commitments and the general and species-specific (i.e., Bulletins) labeling changes set forth in the Description of the Action in the NMFS BiOp (also see Attachment 4), NMFS was able to conclude that methomyl is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. Therefore, per the timeline set forth in NMFS BiOp, all technical registrants with pesticide products containing methomyl must request amendments to their technical registrations and labels, as described below, **within 60 days of BiOp issuance (i.e., by March 31, 2024)**.

The following label language must be added to the beginning of the "*Directions for Use*" section of all technical product labels:

- "This product may only be formulated into registered end-use products with EPA-approved labeling that contain the language and restrictions per Attachment 4 EPA Summary of Label Changes for Methomyl Products in the National Marine Fisheries Service nationwide Final Biological Opinion: Methomyl, dated January 31, 2024."

² <https://www.fisheries.noaa.gov/resource/document/conference-and-biological-opinion-environmental-protection-agencys-registration>

- “This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions (to be placed at the beginning of the “Directions for Use” section of all end-use product labels):
“ENDANGERED AND THREATENED SPECIES PROTECTION REQUIREMENTS: Before using this product, you must obtain any applicable Endangered Species Protection Bulletins (‘Bulletins’) within six months prior to or on the day of application. To obtain Bulletins, go to Bulletins Live! Two (BLT) at <https://www.epa.gov/pesticides/bulletins>. When using this product, you must follow all directions and restrictions contained in any applicable Bulletin(s) for the area where you are applying the product, including any restrictions on application timing if applicable. It is a violation of Federal law to use this product in a manner inconsistent with its labeling, including this labeling instruction to follow all directions and restrictions contained in any applicable Bulletin(s). For general questions or technical help, call 1-844-447-3813, or email ESPP@epa.gov.”
- “This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions (to be placed at the beginning of the “Directions for Use” section of all end-use product labels):
“REPORTING ECOLOGICAL INCIDENTS: For guidance on reporting ecological incidents, including death, injury, or harm to plants and animals, including bees and other non-target insects, see EPA’s Pesticide Incident Reporting website: <https://www.epa.gov/pesticide-incidents> or call (registrant phone number)”.

A list of your currently registered products containing methomyl is attached to this letter. EPA requests that you inform the Agency how you intend to address the label amendments specified in NMFS’ BiOp by indicating in the product list whether or not a product is subject to the requirements of the BiOp. The label language described above must be added to all product labels. Please send the completed product list by email to the Chemical Review Manager (the person listed at the end of this letter), within 10 business days of receiving this letter.

Within 60-days of the issuance of the NMFS BiOp (i.e., by March 31, 2024), submit a cover letter, a completed Application for Registration (EPA form 8570-1) and copies of your amended product labels. For each label, submit two copies, a clean copy and an annotated copy with changes. To allow EPA to process the amendment application efficiently, include only the amendments determined by EPA to be necessary and described in this letter as well as the following statement on the Application for Registration (EPA form 8570-1):

“I certify that this amendment satisfies the requirements as determined by EPA to be consistent with NMFS’ Biological Opinion for methomyl, and no other changes have been made to the labeling of this product. I understand that it is a violation of 18 U.S.C. Section 1001 to willfully make any false statement to EPA. I further understand that if this amendment is found not to satisfy the requirements determined by EPA, this product may be subject to further regulatory action.”

Within the required timeframe, submit the required documents to the “Re-evaluation section” of EPA’s Pesticide Submission Portal (PSP). The PSP can be accessed through EPA’s Central Data Exchange (CDX) using the following link: <https://cdx.epa.gov/>. Please note that the Agency

prefers submissions be made electronically. Contact the Chemical Review Manager if you need to submit your labels by another method.

If you need to resubmit your labels, you can do so via CDX but ensure that you identify your submission as a "Resubmission," (i.e., check "No" if you're asked if it's an initial submission).

Based on the BiOp, in the absence of this revised labeling, methomyl products will not have sufficient directions for use and/or precautionary statements to adequately protect federally-listed species. Therefore, failure to submit requests to properly amend labels in a timely and adequate manner may result in regulatory action up to and including product cancellation.

If you have any questions, please contact Chemical Review Manager, Rachel Blatnick, by phone at (202) 566-2223 or via email at Blatnick.rachel@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Costello".

Kevin Costello
Branch Chief Risk Management and
Implementation Branch II
Pesticide Re-evaluation Division

Attachments:

(1) *Required label language table for technical product labels per the NMFS BiOp*

(2) *List of Currently Registered Technical Pesticide Products Containing methomyl*

cc: Michael Walsh, PM 11, Registration Division (RD)



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

VIA E-MAIL, RETURN RECEIPT REQUESTED

February 28, 2024

Subject: End use label changes necessary to comply with the January 31, 2024, National Marine Fisheries Services' (NMFS) Biological Opinion on the effects of the following pesticide on federally-listed endangered and threatened (listed) species: Methomyl

Dear Sir or Madam:

You are receiving this letter because your company holds active end-use registrations for methomyl products and those labels must be amended consistent with the NMFS Biological Opinion (BiOp) on the effects of methomyl on federally-listed endangered and threatened (listed) species. The BiOp may be found on the NMFS website.³

As is common practice in nationwide pesticide consultations, the methomyl technical registrants (Tessenderlo Kerley, Inc., Albaugh, LLC., and Sinon Corporation) were included in the consultation process. During the consultation, the technical registrants committed to amend their technical and end use methomyl product labels and registrations so that these measures could be incorporated into the Methomyl BiOp Description of the Action and considered by NMFS. With these commitments and the general and species-specific (i.e., Bulletins) labeling changes set forth in the Description of the Action in the NMFS BiOp, NMFS was able to conclude that methomyl is not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. The obligations in the BiOp apply to all registrants with pesticide products containing methomyl, therefore requests to amend your registrations and labels are necessary to comply with the Opinion. The methomyl technical registrants also agreed with EPA's proposal to include some standard labeling updates (e.g., mode of action language).

A list of your currently registered products containing methomyl is attached to this letter. EPA requests that you inform the Agency how you intend to address the label amendments specified in the NMFS's BiOp by indicating in the product list whether or not a product is subject to the requirements of the BiOp. The label language described in the attachment must be added to all end-use product labels (as applicable determined by the label uses). Please send the completed product list by email to the Chemical Review Manager (the person listed at the end of this letter), within 10 business days of receiving this letter.

³ <https://www.fisheries.noaa.gov/resource/document/conference-and-biological-opinion-environmental-protection-agencys-registration>

Within 60-days of the receipt of this letter, submit a cover letter, a completed Application for Registration (EPA form 8570-1) and copies of your amended product labels. For each label, submit two copies, a clean copy and an annotated copy with changes. To allow EPA to process the amendment application efficiently, include only the amendments determined by EPA to be necessary and described in this letter as well as the following statement on the Application for Registration (EPA form 8570-1):

“I certify that this amendment satisfies the requirements as determined by EPA to be consistent with the NMFS Biological Opinions for Methomyl, and no other changes have been made to the labeling of this product. I understand that it is a violation of 18 U.S.C. Section 1001 to willfully make any false statement to EPA. I further understand that if this amendment is found not to satisfy the requirements determined by EPA, this product may be subject to further regulatory action.”

Because State Local Need (SLN) registrations under FIFRA section 24(c) become FIFRA section 3 registrations and SLN registrations were included in the Description of the Action in the NMFSs' BiOp, registrants for these types of registrations are also responsible for submitting requests to EPA to amend those labels. Registrants must determine whether the labels need to be amended. At the very least, EPA requires the inclusion of the Mode of Action (MOA) box for resistance management (the MOA box is a requirement in the attached table). Contact your state agency before submitting the SLN labels to EPA. Your state agency may require additional actions prior to submitting your labels to EPA.

Within the required timeframe, submit the required documents via the following:

- (1) **Section 3 labels** – to the “Re-evaluation section” of EPA’s Pesticide Submission Portal (PSP). The PSP can be accessed through EPA’s Central Data Exchange (CDX) using the link <https://cdx.epa.gov/>.
- (2) **SLN labels** – via email to OPP_PRD_RRLabels@epa.gov. Please use the following format as the subject line of your email: “METHOMYL SLN [Reg. No.] per NMFSs’ Biological Opinion.”

Please note that the Agency prefers submissions be made electronically. Contact the Chemical Review Manager if you need to submit your labels by another method. If you need to resubmit your Label, you can do so via the following:

- (1) **Section 3 labels** – CDX using the “Re-evaluation section” of the PSP. Ensure that you identify your submission as a “Resubmission,” (i.e., check “No” if you are asked if it is an initial submission).
- (2) **SLN labels** – email to OPP_PRD_RRLabels@epa.gov with the following format for the subject line: “Resubmission METHOMYL SLN [Reg. No.] per the Services’ Biological Opinions.”

Based on NMFS’s BiOp, in the absence of this revised labeling, methomyl products will not have sufficient directions for use and/or precautionary statements to adequately protect federally-listed species. Therefore, failure to submit requests to properly amend labels in a timely and adequate manner may result in regulatory action.

If you have any questions, please contact Rachel Blatnick by phone at (202) 566-2223 or via email at blatnick.rachel@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Costello". The signature is fluid and cursive, with the first name "Kevin" and last name "Costello" clearly distinguishable.

Kevin Costello
Branch Chief
Risk Management and Implementation Branch II
Pesticide Re-evaluation Division

Attachments:

- (1) Labeling Changes for Methomyl Products per the 2024 NMFS BiOp
- (2) List of Currently Registered End Use Pesticide Products Containing Methomyl

cc: Michael Walsh, PM 11 Registration Division (RD)

EPA Summary of Label Changes for Methomyl Products

Description	Label Language for Methomyl Products	Placement on Label	Origin of Language
	Technical and Manufacturing Use Products		
Language and Restriction Requirements	“Except where this product is formulated into pesticide products solely for export (FIFRA section 17 and 40 CFR Part 168, Subpart D), this product may only be formulated into registered end-use products with EPA-approved labeling that contain the language and restrictions per Attachment 4 EPA Summary of Label Changes for Methomyl Products in the National Marine Fisheries Service nationwide Final Biological Opinion: Methomyl, dated January 31, 2024.”	Directions for Use (at the beginning of the section)	Standard EPA language
Endangered Species Protection Requirements (1% AI fly bait formulations exempted)	“This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions (<i>to be placed at the beginning of the “Directions for Use” section of all end-use product labels</i>): “ENDANGERED AND THREATENED SPECIES PROTECTION REQUIREMENTS: Before using this product, you must obtain any applicable Endangered Species Protection Bulletins (“Bulletins”) within six months prior to or on the day of application. To obtain Bulletins, go to Bulletins Live! Two (BLT) at https://www.epa.gov/pesticides/bulletins . When using this product, you must follow all directions and restrictions contained in any applicable Bulletin(s) for the area where you are applying the product, including any restrictions on application timing if applicable. It is a violation of Federal law to use this product in a manner inconsistent with its labeling, including this labeling instruction to follow all directions and restrictions contained in any applicable Bulletin(s). For general questions or technical help, call 1-844-447-3813, or email ESPP@epa.gov.”	Directions for Use, at the beginning under the heading “ENDANGERED AND THREATENED SPECIES PROTECTION REQUIREMENTS”	FIFRA Proposed Interim Decision (PID) with Interim Ecological Mitigation (IEM) updates
Ecological Incidents Statement	“This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions (<i>to be placed at the beginning of the “Directions for Use” section of all end-use product labels</i>): “REPORTING ECOLOGICAL INCIDENTS: For guidance on reporting ecological incidents, including death, injury, or harm to plants and animals, including bees and other non-target insects, see EPA’s Pesticide Incident Reporting website: https://www.epa.gov/pesticide-incidents or call (registrant phone number)”. ”	Directions for Use, under the heading “REPORTING ECOLOGICAL INCIDENTS”	FIFRA PID/IEM updates

Description	Label Language for Methomyl Products	Placement on Label	Origin of Language				
	End Use Products						
Mode of Action	<p>Note to registrant:</p> <ul style="list-style-type: none"> • Include the name of the ACTIVE INGREDIENT in the first column • Include the word “GROUP” in the second column • Include the MODE/SITE OF ACTION CODE in the third column (for fungicides this is the FRAC Code, and for insecticides this is the Primary Site of Action); for Herbicides this is SITE OF ACTION • Include the type of pesticide (<i>i.e.</i>, HERBICIDE or FUNGICIDE or INSECTICIDE) in the fourth column. <table border="1"> <tr> <td>Methomyl</td><td>GROUP</td><td>1a</td><td>INSECTICIDE</td></tr> </table>	Methomyl	GROUP	1a	INSECTICIDE	<p>Front Panel, upper right quadrant.</p> <p>All text should be black, bold face and all caps on a white background, except the mode of action code, which should be white, bold face and all caps on a black background; all text and columns should be surrounded by a black rectangle.</p>	Standard EPA Language
Methomyl	GROUP	1a	INSECTICIDE				
Updated Respirator Language	<p>[Note to registrant: If your end-use product only requires protection from particulates only (low volatility), use the following language:]</p> <p>“Wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any N*, R or P filter; <u>OR</u> a NIOSH-approved elastomeric particulate respirator with any N*, R or P filter; <u>OR</u> a NIOSH-approved powered air purifying respirator with HE filters.”</p> <p>*Drop the “N” option if there is oil in the product’s formulation and/or the product is labeled for mixing with oil-containing products.</p> <p>[Note to registrant: For respiratory protection from organic vapor and particulates (or aerosols), use the following language:]</p> <p>“Wear a minimum of a NIOSH-approved elastomeric half mask respirator with organic vapor (OV) cartridges and combination N*, R, or P filters; <u>OR</u> a NIOSH-approved gas mask with OV canisters; <u>OR</u> a NIOSH-approved powered air purifying respirator with OV cartridges and combination HE filters.”</p> <p>[Note to registrant: <u>For products requiring protection for organic vapor only,</u> use the following language:]</p> <p>“Wear a minimum of a NIOSH-approved elastomeric half mask respirator with organic vapor (OV) cartridges; <u>OR</u> a NIOSH-approved full-face respirator with OV</p>	In the Personal Protective Equipment (PPE) within the Precautionary Statements	Standard EPA Language				

	cartridges; <u>OR</u> a gas mask with OV canisters; <u>OR</u> a powered air purifying respirator with OV cartridges.” *Drop the “N” option if there is oil in the product’s formulation and/or the product is labeled for mixing with oil-containing products.		
Resistance-management labeling statements for insecticides and acaricides	Include resistance management label language for insecticides/acaricides from PRN 2017-1 (https://www.epa.gov/pesticide-registration/pesticide-registration-notice-year)	Directions for Use, prior to directions for specific crops	Standard EPA Language
Endangered Species Protection Requirements For all products with outdoor uses (1% AI fly bait formulations exempted)	“ENDANGERED AND THREATENED SPECIES PROTECTION REQUIREMENTS: Before using this product, you must obtain any applicable Endangered Species Protection Bulletins (‘Bulletins’) within six months prior to or on the day of application. To obtain Bulletins, go to Bulletins Live! Two (BLT) at https://www.epa.gov/pesticides/bulletins . When using this product, you must follow all directions and restrictions contained in any applicable Bulletin(s) for the area where you are applying the product, including any restrictions on application timing if applicable. It is a violation of Federal law to use this product in a manner inconsistent with its labeling, including this labeling instruction to follow all directions and restrictions contained in any applicable Bulletin(s). For general questions or technical help, call 1-844-447-3813, or email ESPP@epa.gov.”	Directions for Use, under the heading “Endangered and Threatened Species Protection Requirements”	FIFRA PID/IEM updates
Ecological Incidents Statement For all products with outdoor uses	“REPORTING ECOLOGICAL INCIDENTS: For guidance on reporting ecological incidents, including death, injury, or harm to plants and animals, including bees and other non-target insects, see EPA’s Pesticide Incident Reporting website: https://www.epa.gov/pesticide-incidents or call (registrant phone number)”.	Directions for Use, under the heading “REPORTING ECOLOGICAL INCIDENTS”	FIFRA PID/IEM updates
Annual Application Rate Limit	“Do not apply more than 13 lbs AI/ acre/ year.” ¹	Directions for Use	Applicant commitments during consultation
Rain-related statements (except for products that require watering in)/Runoff Mitigation Language	“Do not apply during rain. Do not apply when soil in the area to be treated is saturated (if there is standing water on the field or if water can be squeezed from soil) or if NOAA/National Weather Service predicts a total rainfall of 1 inch or greater over the 48 hours following the day of application, only considering a 48-hour period when, at any point during the 48-hour period, the precipitation potential is 50% or greater. Detailed National Weather Service forecasts for local weather	Directions for Use	Applicant commitments during consultation with IEM updates

¹ Language to be added to labels as appropriate, based on the current labeled single maximum application rate and number of applications.

	conditions should be obtained on-line at: www.weather.gov or by contacting your local National Weather Service Forecasting Office.”		
Spray Drift Management Application Restrictions for products that are applied as liquid with aerial equipment	<p>“MANDATORY SPRAY DRIFT MANAGEMENT <u>Aerial Applications:</u></p> <ul style="list-style-type: none"> • Do not apply methomyl within 50 feet of residential areas, including schools, homes, playgrounds, recreational areas, athletic fields, residential lawns, gardens, and other areas where children may be present. • Do not release spray at a height greater than 10 ft above the ground or vegetative canopy, unless a greater application height is necessary for pilot safety. • Applicators must select nozzle and pressure that deliver medium or coarser droplets in accordance with American Society of Agricultural & Biological Engineers Standard 641 (ASABE S641). • During application, the Sustained Wind Speed, as defined by the National Weather Service (standard averaging period of 2 minutes) must register between 3 and 10 miles per hour. • Wind speed and direction must be measured on location using a windsock, an anemometer (including systems to measure wind speed or velocity on an aircraft), or an aircraft smoke system. • Wind speed must be measured at the release height or higher, in an area free from obstructions such as trees, buildings, and farm equipment. • Applicators must use a minimum of ½ swath displacement upwind at the downwind edge of the field. • The boom length must be 75% or less of the wingspan for fixed-wing aircraft and 90% or less of the rotor diameter for helicopters. • Do not apply during temperature inversions.” 	Directions for Use, in a box titled “Mandatory Spray Drift Management” under the heading “Aerial Applications” Placement for these statements should be in general directions for use, before and use-specific directions for use.	FIFRA PID/IEM updates
Spray Drift Management Application Restrictions for products that are applied as liquid with ground boom equipment	<p>“MANDATORY SPRAY DRIFT MANAGEMENT <u>Ground Boom Applications:</u></p> <ul style="list-style-type: none"> • During application, the Sustained Wind Speed, as defined by the National Weather Service (standard averaging period of 2 minutes), must register between 3 and 10 miles per hour. • Wind speed and direction must be measured on location using a windsock or anemometer (including systems to measure wind speed or velocity using application equipment). 	Directions for Use, in a box titled “Mandatory Spray Drift Management” under the heading “Ground Boom Applications”	FIFRA PID/IEM updates

	<ul style="list-style-type: none"> • Wind speed must be measured at the release height or higher, in an area free from obstructions such as trees, buildings, and farm equipment. • Do not release spray at a height greater than 3 feet above the ground or crop canopy. • Applicators must select nozzle and pressure that deliver medium or coarser droplets in accordance with American Society of Agricultural & Biological Engineers Standard 572 (ASABE S572). • Do not apply during temperature inversions.” 		
Spray Drift Management Application Restrictions for products that are applied as liquid with airblast equipment	<p>“MANDATORY SPRAY DRIFT MANAGEMENT <u>Airblast applications:</u></p> <ul style="list-style-type: none"> • Sprays must be directed into the canopy. • During application, the Sustained Wind Speed, as defined by the National Weather Service (standard averaging period of 2 minutes), must register between 3 and 10 miles per hour. • Wind speed and direction must be measured on location using a windsock or anemometer (including systems to measure wind speed or velocity using application equipment). • Wind speed must be measured at the release height or higher, in an area free from obstructions such as trees, buildings, and farm equipment. • User must turn off outward pointing nozzles at row ends and when spraying outer row. • Do not apply during temperature inversions.” 	Directions for Use, in a box titled “Mandatory Spray Drift Management” under the heading “Airblast Applications”	FIFRA PID/IEM updates
Directions for mixing/loading products packaged in water soluble bags	<p>Instructions for Introducing Water Soluble Packages Directly into Spray tanks:</p> <p>"Water-Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607(d)].</p> <p>Handling Instructions Follow these steps when handling pesticide products in WSPs.</p> <ol style="list-style-type: none"> 1. Mix in spray tank only. 2. Handle the WSP in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions. 	Directions for Use	Standard EPA Language

	<ol style="list-style-type: none"> 3. Keep the WSP in outer packaging until just before use. 4. Keep the WSP dry prior to adding to the spray tank. 5. Handle with dry gloves and according to the label instructions for PPE. 6. Keep the WSP intact. Do not cut or puncture the WSP. 7. Reseal the WSP outer packaging to protect any unused WSP(s). <p>Mixing Instructions</p> <p>Follow the steps below when mixing this product, including if it is tank-mixed with other pesticide products. If being tank-mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all the pesticide product components do not conflict. Do not tank-mix this product with products that prohibit tank-mixing or have conflicting mixing directions.</p> <ol style="list-style-type: none"> 1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank. 2. Fill tank with water to approximately one-third to one-half of the desired final volume of spray. 3. Stop adding water and stop any agitation. 4. Place intact/unopened WSP into the tank. 5. Do not spray water from a hose or fill pipe to break or dissolve the WSP. 6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation. 7. Dissolving the WSP may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation. 8. Stop agitation before tank lid is opened. 9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSP has fully dissolved and the contents have been thoroughly mixed into the solution. 10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed. 11. Once the WSP has fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation. 12. Use the spray solution when mixing is complete. 13. Maintain agitation of the diluted pesticide mix during transport and application. 		
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	<p>14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.</p> <p>ENGINEERING CONTROLS STATEMENT</p> <p>Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water-soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, a chemical-resistant apron, and chemical-resistant gloves. When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as in case of a spill or equipment break-down.”</p>		
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