

CSS / 159509  
17 / 2

SEP 16 1986

Mr. Jon M. Gehring  
Rigo Company  
P.O. Box 89  
Buckner, KY 40010

Dear Mr. Gehring:

Subject: Disulfoton Registration Standard Followup  
Rigo Insyst-D 15% Granular Systemic Insecticide  
EPA Registration No. 70-236  
Your Letter Dated May 22 and June 18, 1985

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. The common accepted chemical name "Disulfoton" must appear preceding the chemical name in the ingredients statement on the label.
2. The chemical name "ethulthio" should be changed to "ethylthio."
3. The signal word, child hazard warning, the words POISON, PELIGRO, and the skull and crossbones must be in red ink.
4. For all products having the signal word "DANGER," the Statement of Practical Treatment (SOPT) must appear on the front label. We suggest it follow the skull and crossbones.
5. Under the SOPT the subheading should read "If in Eyes, wash with plenty of water. Call a physician immediately." In addition add the subheading "If Inhaled." Followed by "Remove victim to fresh air. Apply artificial respiration if indicated. Call a physician immediately."
6. The poisoning symptoms should be made a part of the "Note to Physician" section.

86182:Shell:LR-12:KENCO:9/9/86:9/18/86:SONJA:DSG

CONCURRENCES

SYMBOL ▶								
SURNAME ▶								
DATE ▶								

- 7. We suggest that the SOPT be blocked with solid print to make it stand out.
- 8. Please add a P.O. Box or street address to the company name and city/state.
- 9. The Precautionary Statements heading should be followed by the wording "HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS" "DANGER."
- 10. The Spanish text must be on the front label, and must be found in close proximity to the Spanish signal word.
- 11. We suggest that the word "POISON" be located immediately to the left of the skull and crossbones and the word "PELIGRO" be located to the right.
- 12. Under the "Precautionary Statements" section the following should be revised to read:
  - "Poisonous if swallowed . . . ."
  - ". . . jointly approved by the Mine Safety and Health Administration and by . . . ."
  - ". . . and warmwater before eating, drinking or using tobacco products."
- 13. Under the Storage and Disposal section it is not necessary to have two "Storage" subheadings. Only one is necessary.
- 14. You have two "Directions for Use" headings. The second one should be deleted. It is only necessary to list this heading once.
- 15. Submit five (5) copies of your final printed labeling before you release the product of shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.
- 16. On the front label delete references to applicators, commercial growers, etc. The restrictive use statement covers the uses category.

In addition, a review of the documents that have been submitted reveals that the following product chemistry changes must be made.

- You must submit density information, e.g., lb/gallon for liquids or lb/cu ft for solids.

**BEST AVAILABLE COPY**

379

Our files also indicate that the following must be submitted in order to satisfy the information requirements of the Disulfoton Registration Standard under FIFRA:

- Formulator's Exemption Form (Refer to PR Notice 85-3).

Within 30 days after receipt of this letter you must notify this Agency in regard to your intentions to satisfy the above requirements. If you do not respond within the 30-day period then this registration ~~will~~ *may* be cancelled.

Should you have any questions regarding this matter please contact Jim Shell at (703) 557-4420 or me at (703) 557-2400.

Sincerely yours,

George T. LaRocca  
Product Manager (15)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

Enclosure

**BEST AVAILABLE COPY**

4 9 9

RESTRICTED USE PESTICIDE -

Acute human oral, dermal, and inhalation toxicity. For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

R I G O  
INSYST-D™

Granular Systemic Insecticide

Contains 15% Di-Syston® \*

For Use in Tobacco Beds and Fields to Control Aphids & Flea Beetles.  
For Agricultural, Commercial Grower or Professional Applicator Use Only.

Not for Use or Storage in or Around the Home

Also recommended for Ornamentals, Strawberries (propagating plants only),  
and Raspberries (Nursery Stock in Northeast states only)

ACTIVE INGREDIENT:

O,O-Diethyl S-(2-(ethulthio)ethyl) phosphorodithioate. . . . . 15 %

INERT INGREDIENTS: . . . . . 85 %  
100 %

\*DI-SYSTON is a registered trademark of the Parent Company of  
Farbenfabriken Bayer GmbH, Leverkusen.

EPA Reg. No. 70-236  
EPA Est. No. 70-KY-1

NET WEIGHT  
\_\_\_\_ OUNCES

D A N G E R

KEEP OUT OF REACH OF CHILDREN - 10 pt.

POISON - 14 pt.



PELIGRO - 14 pt.

See side panels for Additional Precautionary Statements  
and Statement of Practical Treatment

ACCEPTED  
with COMMENTS  
EPA Letter Date:

Manufactured for

SEP 16 1986

RIGO COMPANY

BUCKNER, KENTUCKY 40010

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the purpose of registration under FIFRA, etc.  
70-236

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS

DANGER POISON PELIGRO

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado ampliamente.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Poisonous if swallowed, inhaled or absorbed through skin. Rapidly absorbed through the skin. Do not get in eyes, or on skin. Do not breathe dust. Wear protective clothing, and cotton or natural rubber gloves. If cotton gloves are used, they must be laundered or discarded after each day's use. Do not wear the same gloves for other work. Rubber gloves should be washed with soap and water after each use.

When using INSYST-D 15% Granular Insecticide in enclosed areas, wear a mask or respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11.

Do not contaminate feed or food. Keep out of reach of children. Wash hands, arms and face thoroughly with soap and warm water before eating or smoking. Wash all contaminated clothing with soap and hot water before reuse.

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

SYMPTOMS OF POISONING

A sense of "tightness" in the chest. Sweating. Contracted pupils. Stomach pains. Vomiting and diarrhea.

STATEMENT OF PRACTICAL TREATMENT

In Case of Poisoning, call a physician immediately. Have patient lie down and keep quiet. If Swallowed, call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person. If On Skin, remove contaminated clothing, and wash skin immediately with soap and warm water. If Eyes are Contaminated, wash with flowing water for a least 15 minutes.

NOTE TO PHYSICIAN: Antidote - Administer atropine sulfate in large therapeutic doses. Repeat as necessary to the point of tolerance. 2-PAM is also antidotal, and may be administered in conjunction with atropine. Compound inhibits cholinesterase, resulting in stimulation of the central nervous system, the parasympathetic nervous system and the somatic motor nerves. Do not give morphine.

Watch for pulmonary edema, which may develop in serious cases of poisoning even after 12 hours. At first sign of pulmonary edema, the patient should be placed in an oxygen tent, and treated symptomatically.

#### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not apply directly to water or wetlands. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes. Cover or incorporate spills.

This pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

#### RE-ENTRY STATEMENT

Do not allow reentry into treated fields within 24 hours of application unless appropriate protective clothing is worn. Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. (Oral warnings should inform workers of areas of or fields that may not be entered without specific protective clothing, period of time field must be vacated and statement of practical treatment in case of accidental exposure.) When oral warnings are given, warnings shall be given in a language customarily understood by workers. Written warnings must include the following information: DANGER. Area treated with Insyst-D on (date of application). Do not enter without appropriate protective clothing until dusts have settled.

#### DIRECTIONS FOR USE

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

#### STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal.  
Storage: Do not store in or around the home. Store in original container separate from other pesticides and fertilizer in locked storage.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Restrictions: Not for home garden use. In commercial topping of flowers by hand, clean gloves should be worn. Do not use on other crops used for food or forage. Use only according to label directions. Application at rates above those shown may result in illegal crop residues. Apply this product only as specified on label. Do not apply this product with a knapsack or other equipment that is placed on the user's body. Do not treat crops grown in the greenhouse. Do not plant any food or feed crop in rotation after a field treatment with disulfoton unless it is a registered use for disulfoton.

DIRECTIONS FOR USE

INSYST-D 15% granular systemic insecticide provides "built-in" protection because it acts from within the sap stream of the plant. It stops harmful insects before they get started, but does not destroy populations of parasites, predators and pollinators. These beneficial insects continue to live to assist in controlling pests. When INSYST-D is applied at planting time, it is absorbed into the growing plant where it provides many weeks of protection against sucking insects, even season-long protection on some crops. When applied as a side-dressing, INSYST-D moves with soil moisture and is absorbed by the roots.

As a preplant treatment for ornamental flowers, shrubs and trees, apply granules evenly to seed bed and mix into soil; then place seeds or transplants in the normal manner. Established plants may be treated by distributing granules uniformly under foliage canopy. Mixing the granules into top soil and watering will accelerate entry into the plant, as the chemical will leach into the root zone and be taken up by the root system.

RECOMMENDED APPLICATIONS

FOR USE ON TOBACCO, ORNAMENTALS, AND NON-BEARING FRUIT (Strawberries, Raspberries)

CROP	INSECT	DOSAGE INSYST-D	REMARKS
Tobacco Transplant Beds	Aphids Flea Beetles	1 oz. per 100 sq. ft. of bed	Apply evenly over bed area using shaker can. Work the granules into the top 2 to 3 inches of soil and seed beds in normal manner. An alternative treatment may be made by broadcasting the

8 of 9

CROP	INSECT	DOSAGE INSYST-D	REMARKS
			granules evenly over the plants after emergence, and watering thoroughly. Do not make more than one application to transplant beds.
Tobacco Field Application	Aphids Flea beetles	20 to 40 oz. per 1000 ft. of row (For any row spacing*), or 13.3 to 26.7 lbs. per acre (broadcast, or with 48 inch row spacing)	Apply in a 6 to 12 inch band over the row, or as a broadcast treatment immediately before transplanting. Incorporate the granules by working them into the top 2 to 3 inches of soil. Plant crop in the usual way. Do not make more than 1 field application per crop season, regardless of DI-SYSTON formulation used.
	Southern potato wireworm	13.3 to 26.7 lbs. per acre	When applied as described for "Field Application" above. INSYST-D will aid in control of this wireworm.
Non-Bearing Strawberries (Propagating plants only)	Aphids Mites (except cyclamen mite)	17 to 34.4 oz. per 1000 ft. of row (for any row spacing*) or 13.3 to 26.7 lbs. per acre (42 inch row spacing)	Apply by side-dressing on each side of the row, or by broadcasting over the row as needed. Do not use fruit from treated plants for food purposes.
Non-Bearing Raspberries (Nursery stock in Northeast states only)	Aphids	53.3 lbs. per acre	Band Application: Apply specified dosage in a 24 inch band over the row to new or established plantings. Work granules 2 to 3 inches into the soil, using a cultivator or other suitable equipment. A second application of granules may be applied to the soil later in the season. Consult your State Agricultural Experiment Station or Extension Service for proper timing of applications.

\*ON ROW CROPS WHERE ROW SPACING IS EXTREMELY NARROW, DO NOT PLACE TREATED ZONES (BAND OR FURROW) CLOSER TOGETHER THAN 6 INCHES.

BEST AVAILABLE COPY



9 8 9

CROP	INSECT	DOSAGE INSYST-D	REMARKS
<b>ORNAMENTALS (For Use By Commercial Growers or Professional Applicators Only)</b>			
Flowers	Aphids Lace bug Leafhoppers Mites Thrips Whiteflies	10.7 oz. per 150 to 300 feet of row	Apply in a band on each side of the seed furrow, or as a band over the row. Work into soil, and water thoroughly. For treatment of Easter lilies and gladiolus, apply the specified dosage in the furrow over the bulbs after they are set, but before covering with soil. Do not make in-furrow applications to garden lily bulbs. The higher dosage is recommended for heavy organic or muck soils.
Shrubs Trees Forest plantings	Aphids Birch leaf miner Camelia scale Elm leaf beetle European elm scale Holly leaf miner Lace bug Leafhoppers Mimosa web- worm Mites Pine tip moth Soft scale (Coccus hes- peridium) Tea scale Thrips Whiteflies	2.5 to 27 oz. per tree, or 2.5 oz. per inch of trunk diameter	Spread granules uniformly from trunk to drip line on all sides. Work soil and water thoroughly. The higher dosage is recommended for heavy organic or muck soils. For transplanting, equivalent quantities should be applied into planting hole or by dipping seedling in a pudding clay slurry made up of 1 part by weight INSYST-D 15% granular in 6 to 14 parts by weight of clay.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label directions.