

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 14 2004

Ms. Carolyn Brinkley
Senior Regulatory Product Manager Insecticides
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419

Dear Ms. Brinkley:

**Subject: Update in Ingredient Statement and
Updates in First Aid, Storage and Disposal Statements
Profenofos Technical
EPA Reg. No. 100-598
Your Application of November 3, 2003
Agency Letter of July 17, 2002**

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you submit two copies of your final printed label incorporating the following corrections before you release the product for shipment.

1. Relocate the first aid statements to the front panel of the label.
2. Correct the wording in the warranty statements so that it is clear the statements are from Syngenta and not from EPA and to reflect the fact that, in some States, purchasers/users are not limited to the terms set forth in the warranty statements. The warranty section appearing on the label may constitute misbranding under FIFRA 2(q)(1) as it contains text claiming no product liability, thus implying that buyers/users rights for legal remedy are extremely limited. Examples of acceptable clarifying wording are cited below.

Profenofos Technical

For formulation into end use insecticide products intended for nondomestic food, feed, outdoor use - cotton

Active Ingredient:

Profenofos: O-(4-bromo-2-chlorophenyl) O-ethyl S-propyl phosphorothioate 90.4%

Other Ingredients: 9.6%

Total: 100.0%

KEEP OUT OF REACH OF CHILDREN.



DANGER/PELIGRO



POISON

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements on label.

EPA Reg. No. 100-598

Product of XXXX

EPA Est. XXXX

Product ID. XXXX

SCP 598A-L(draft first aid rev. b)

_____ gallons
Net Contents

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:

MAY 14 2004

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 100-598

If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • 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 treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then gives artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.

NOTE TO PHYSICIAN

Contains profenofos, an organophosphate that inhibits cholinesterase. Consider taking venous blood for determination of blood cholinesterase activity (use heparin tube). Administer atropine sulfate, either by intramuscular or intravenous injection, dependant on severity of poisoning. Oximes such as 2-PAM are also antidotal and may be administered, but only in conjunction with atropine. Avoid the use of respiratory depressants, e.g. barbiturates and opiates.

Have the product container or label with you when calling a poison control center or doctor or when going for treatment.

HOT LINE NUMBER

For 24 Hour Medical Emergency Assistance (Human or Animal) or
 Chemical Emergency Assistance (Spill, Leak, Fire, or Accident),
 Call
1-800-888-8372

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**DANGER/PELIGRO
POISON**



Fatal if absorbed through the skin. Do not get on skin or on clothing. May be fatal if swallowed. Harmful if inhaled. Avoid contact with eyes. Avoid breathing vapors. Remove and wash contaminated clothing before reuse. Do not store near food or feed.

Environmental Hazards

This pesticide is toxic to fish and wildlife. Handle with care in areas frequented by wildlife or near any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters, unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Buyer is solely responsible for any risk created by the use or uses to which it or any User puts this product. SYNGENTA CROP PROTECTION, INC. shall not be responsible for any risk caused by the incorporation of this product into an end use product by Buyer or User. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and Buyer and User assume the risk of any such use. SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall SYNGENTA or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitations of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

DIRECTIONS FOR USE

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

Only for formulation into an insecticide for the following use: cotton.

Note to Formulators

Formulators are responsible for providing data to support registration of products formulated from Profenofos Technical.

STORAGE AND DISPOSAL

Do not store near food or feed. Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage

Store in a well-ventilated area inaccessible to children and pets.

Pesticide Disposal

Pesticide waste is acutely hazardous. Open dumping is prohibited. Pesticide that cannot be used or chemically reprocessed must be disposed of according to federal, state, or local procedures under the Resource Conservation and Recovery Act.

Container Disposal

Thoroughly clean container before reuse. Consult Federal, state, or local disposal authorities for approved alternative procedures.

Emergency Response

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during clean up and disposal of wastes.

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For non-emergency (e.g., current product information) call
Syngenta Crop Protection at 1-800-334-9481.

Syngenta Crop Protection, Inc.
Greensboro, North Carolina 27409
www.syngenta-us.com

SCP 598A-L(draft first aid rev b)

PRO FEN TEC 598A-L (draft first aid rev b)clean-lg-10-22-03 000100-00598.20030919b.firstaidrevb.PDF

CHRONOLOGY OF LABEL CHANGES

9-19-03-Draft – Revised First Aid per PR Notice 2001-1, added Spanish signal word and precautionary statement

10-22-03 – DRAFT REVISION b – IN ADDITION TO REVISED FIRST AID LANGUAGE, AMENDED LABEL AS DIRECTED BY EPA REVIEW OF JULY 16, 2002 – INCLUDING CHANGE IN PERCENT AI, ADDITION OF PESTICIDE DISPOSAL STATEMENT, PLACING STORAGE & DISPOSAL IN A BOX, AND AMENDMENT OF PESTICIDE DISPOSAL LANGUAGE.