

OCT - 4 1991

Ms. Carolyn Bussey
Ciba-Geigy Corporation
P.O. Box 18300
Greensboro, NC 27419-8300

Dear Ms. Bussey:

Subject: Revised Confidential Statement of Formula
D.z.n Diazinon 1/2% ME Insecticide
EPA Reg. No. 100-648
Your submission dated June 21, 1991

The Agency has completed its review of the revised Confidential Statement of Formula (CSF) expressing the percentage of diazinon as pure active ingredient, rather than as the percentage of the manufacturing-use product used, which was submitted as a follow-up to your meeting with the Agency's Product Chemistry Section on May 8, 1991. The CSF dated 6/21/91 is not acceptable because it is not in agreement with accepted labeling. Specifically, the percentage declared on the label lies below the lower certified limit and is not the same percentage as the nominal percentage given on the CSF. Assuming that you do not intend to revise the label declaration, since "1/2%" appears in the product name, then the CSF will have to be adjusted. Certified limits similar to those for your other 1/2% diazinon product, "D.z.n 0.5 RTU" (EPA Reg no. 100-659) would be appropriate, i.e. the lower and upper certified limits should bracket the nominal (label) percentage. When establishing the new lower certified limits please ensure that the product will remain efficacious even if it is produced at the lower certified limit.

As pointed out in the Agency's letter dated February 19, 1991, the Diazinon Registration Standard stipulated in the requirements for product specific chemistry data for end-use products (Table C) that the Discussion of the Formation of Impurities (61-3) must specifically address the formation of diazoxon, TEPP, and its sulfur derivatives. Furthermore, the requirement for Certification of Ingredient Limits (62-2) specifically requires that certified upper limits for each toxicologically significant impurity present at < 0.1% (w/w) must appear on the CSF (i.e., certified upper

limits for the same impurities that must be specifically addressed under 61-3 [diazoxon, TEPP, and its sulfur derivatives] must appear on the CSF form if they are present in any amount). Ciba-Geigy indicated in the May 8, 1991 meeting that these impurities would indeed be present in very small amounts in diazinon end-use products, because they are present in small amounts in the manufacturing use product from which they are derived, and that detectable levels had been observed in the storage stability studies on end-use products. Although you indicated at May 8, 1991 meeting that Ciba-Geigy's chemistry section would be in work on these specific requirements immediately, to date the agency has not received revised Discussions of Formation of Impurities (61-3) and revised CSFs including the upper certified limits for the toxicologically significant impurities (62-2) for your diazinon end-use products, including the subject product. Please respond to this deficiency **within 60 days** of the date of this letter. A revised Discussion of the Formation of Impurities (61-3), specifically addressing those toxicologically significant impurities identified in the Diazinon Registration Standard, must be submitted. A revised Confidential Statement of Formula, EPA Form 8570-4 (revised 2/85), including certified upper limits for any toxicologically significant impurities present, must also be submitted.

Sincerely yours,

George T. LaRocca
 Product Manager (13)
 Insecticide Rodenticide Branch
 Registration Division (H7505C)

D·z·n[®] diazinon 1/2% ME

Insecticide

For use in and around the home

For control of cockroaches, ants, silverfish, brown dog ticks, fleas, pantry and other insects as specified in label directions.

Ready-to-Use Microemulsion Formula in a Ready-to-Use Container

2-Way Nozzle - Spray or Stream

Active Ingredient:

Diazinon: O, O-Diethyl O-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate 0.5%

Inert Ingredients: 99.5%

Total. 100.0%

See directions for use on panel at right.

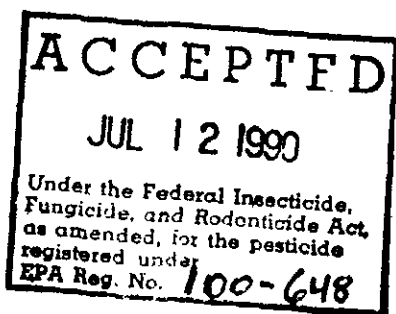
KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements on back panel.

EPA Reg. No. 100-648

EPA Est. 100-AL-1



Gallons

U. S. Standard Measure

DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product. If terms are not acceptable, return the unopened product container at once.

Conditions of Sale and Warranty

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of CIBA-GEIGY or the Seller. All such risks shall be assumed by the Buyer.

CIBA-GEIGY warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. **CIBA-GEIGY makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall CIBA-GEIGY or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product.** CIBA-GEIGY and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of CIBA-GEIGY.

DIRECTIONS FOR USE

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

General Information

This product is a ready-to-use microemulsion product containing diazinon and is packaged in this ready-to-use container. Hold container upright and spray into cracks, crevices, and other surface areas as specified in label directions.

There is no need for further dilution. This product is intended for use inside the home and for limited use outside the home as a spot treatment to house foundation walls and around windows and doors for the control of those pests specified on this label.

INDOOR USE

Controls

Cockroaches (waterbugs), ants, silverfish, carpet beetles, spiders, scorpions, and exposed stages of sawtoothed grain beetle, flour beetle, rice weevil, cigarette beetle, drugstore beetle, and Indian meal moth.

Precautions: (1) Do not use this product indoors as an overall surface spray or as a space spray; take care not to introduce this product into the air during application. (2) Use only in well-ventilated areas. (3) Do not apply where children are likely to frequently contact treated surfaces. (4) Remove or cover fish bowls and remove pets before application. (5) Do not treat pets or plants with this product. (6) Do not allow children or pets in treated areas until surface has dried. (7) If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. (8) Avoid excessive wetting of carpets or floor coverings and unfinished materials. (9) Care should be taken to avoid spotting of walls, wall coverings, and fabrics. (10) Do not apply directly to upholstery, furniture, leather, draperies, or stained surfaces because damage may occur. (11) Do not apply to areas, surfaces, or utensils which will contact food or feed. (12) Exposed food should be covered or removed during application. (13) All food processing sur-

faces and utensils should be covered during application or thoroughly washed with soap and water before use. (14) Do not use this product in conduits, motor housings, or electrical switch boxes. (15) Do not use in edible product areas of food processing plants, restaurants, or other areas where food or feed is commercially prepared or processed. (16) Do not use in serving areas while food is exposed.

Cockroaches (Waterbugs), Ants, Silverfish: Make spot applications to baseboards, areas around water pipes, cracks and crevices, surfaces behind and beneath cabinets, refrigerators, sinks, stoves, and similar areas where these insects hide. Spray areas until wet. Repeat application as necessary to maintain control.

Carpet beetles: Spray in spot applications along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets and on shelving, and wherever these insects are seen or suspected.

Spiders and Scorpions: Spray around windows, doors, and along baseboards. Make spot applications to other areas over which these pests may crawl.

Brown dog ticks, Fleas*: Apply thoroughly to infested areas around baseboards, window and door frames, wall cracks, sleeping quarters of household pets, and localized areas of floors and floor coverings. Fresh bedding should be placed in animal quarters following treatment. Do not treat animals with this product. Repeat as necessary.

*Controls adult fleas on areas treated.

Pantry Pests - Exposed Stages (Sawtoothed grain beetle, flour beetle, rice weevil, cigarette beetle, drugstore beetle, Indian meal moth): Spray on shelves and in cupboards where food containers suspected of being infested are stored. Remove all food and shelving paper before spraying. Do not replace the food packages until spray has dried. Cover shelves with shelving paper. This treatment is supplemental to good housekeeping, since it will have no effect on insects breeding within food packages. Infested food packages should be destroyed.

OUTDOOR USE

Precautions: (1) Spray with wind to your back. If clothing becomes wet from spray during use, remove clothing after spraying, wash affected body areas thoroughly with soap and water, and launder clothing before wearing again. (2) Do not allow children or pets to contact treated areas until spray has dried. (3) Do not apply to lawns or other desirable plants.

House Foundation Treatment

This product will control ants, boxelder bugs, brown dog ticks, chiggers, clover mites, cockroaches, crickets, earwigs, fleas, flies, millipedes, sowbugs, spiders, and collembola (springtails) which are commonly found near the house and may enter the house. Apply as a spot treatment to house foundation walls and around doors and windows where these pests are likely to enter. Repeat application as necessary.

Storage and Disposal

Storage

Keep from freezing. Store above 32°F. Store in an area inaccessible to children and pets.

Disposal

Do not reuse empty container. Rinse thoroughly before discarding in trash. Securely wrap original container in several layers of newspaper and discard in trash.

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing vapor or spray mist. Avoid contact with eyes, skin and clothing. Wash thoroughly after handling and before eating or smoking. May cause contact sensitization following repeated contact with skin of susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Remove and wash contaminated clothing before reuse. Remove pets from area, and cover fish bowls before spraying. Keep children and pets off treated areas until the areas are dry.

Statement of Practical Treatment

If swallowed: Call a physician or Poison Control Center, immediately. Give milk or water. Do not induce vomiting unless no other treatment is available, and then preferably under medical supervision. If it is necessary to induce vomiting, give victim one or two glasses of water and insert finger in back of throat. Do not induce vomiting or give anything by mouth if person is unconscious or convulsing.

If inhaled: Remove victim to fresh air and apply artificial respiration if indicated.

If on skin: Wash promptly with soap and water. Rinse thoroughly.

If in eyes: Rinse eyes with plenty of water. Get medical attention if irritation develops or persists.

Note to Physician: This product is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered but only in conjunction with atropine.

Environmental Hazards

This product is highly toxic to birds, fish and other wildlife including waterfowl. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water by disposal.

This pesticide is highly toxic to bees exposed to direct treatment or to residues on blooming plants where they feed. Do not allow this pesticide to drift to blooming plants, if bees are visiting the treatment area. Do not apply this product to or allow it to drift to food crops or any desirable vegetation at any time.

D-z-n® trademark of CIBA-GEIGY for diazinon

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Agricultural Division
CIBA-GEIGY Corporation
Greensboro, North Carolina 27419
CGA 1L122G 060



**COMPANY
NUMBER**

100

**PRODUCT
SERIAL NO.**

648

**LABEL
APPROVAL
DATE**

7-12-90

D·z·n· diazinon 1/2% ME

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Total: 100.0%

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See additional precautionary statements on back panel.

EPA Reg. No. 100-648

EPA Est. 100-AL-1

BEST AVAILABLE COPY

ACCEPTED
JUL 12 1990
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 100-648

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Gallons

U. S. Standard Measure

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