

100-902

9/24/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 24 2002

FEDERAL  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**Carolyn Brinkley**  
Syngenta Crop Protection, Inc.  
PO Box 18300  
Greensboro, NC 27419

**Subject:** Emamectin Technical, EPA Reg. # 100-902  
label amendment submitted 11/8/01  
accepted with comments

Dear Ms. Brinkley,

The revised labeling reference to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided you incorporate the changes required by the Agency as listed below.

Topic	Action required
Directions for Use site list	DELETE existing single sentence paragraph listing sites: "This product may be used ... and head lettuce."
Front Panel site list	MOVE new site text (inserted between product name and active ingredient statement) from front panel to Directions for Use following "It is a violation of Federal law ...." The new site text replaces the old single sentence site paragraph deleted as per above. New site list has three items in a list format: "This product may be used only .... 1. Agricultural Crops .... 2. Use for which the U.S. EPA has accepted the required data .... 3. Use for experimental purposes ...."

Submit two (2) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of your label stamped "accepted with comments" is enclosed for your records.

If you have any questions please contact me at (703) 308-9423 or Harris.Thomas@EPA.gov.

Sincerely yours,

Thomas C. Harris  
Insecticide / Rodenticide Branch  
Registration Division (7505C)  
Office of Pesticide Programs

enclosure

Emamectin Benzoate Technical

This product may be used only for formulation into an insecticide for the uses listed below (text in parenthesis refers to the general use pattern as referenced in 40CFR158):

1. Agricultural crops (Terrestrial Food Crop)

Head Lettuce and Celery; head and stem Brassica Vegetables [Broccoli, Brussels sprouts, Cabbage, Cauliflower, Cavolo broccolo, Chinese broccoli, Chinese (napa) cabbage, Chinese mustard cabbage, Kohlrabi].

2. Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration excluding any use strictly prohibited by this label.

3. Uses for experimental purposes that are in compliance with U.S. EPA requirements.

Active Ingredient:

<u>Emamectin Benzoate (CAS No. 155569-91-8)</u>	<u>97.0%</u>
<u>Other Ingredients:</u>	<u>3.0%</u>
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN

**SKULL & CROSSBONES]      DANGER/PELIGRO      [SKULL & CROSSBONES]**  
**POISON**  
 [red type}

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.

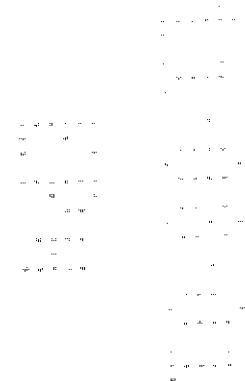
EPA Reg. No. 100-902  
EPA Est. 41448-SW-1

Lot# \_\_\_\_\_  
 Net Weight: \_\_\_\_\_  
 Physical \_\_\_\_\_ kg  
 Assay \_\_\_\_\_ kg  
 Drum No. \_\_\_\_\_

Product of Switzerland

SCP 902A-L1(Draft-A)

**ACCEPTED  
 with COMMENTS  
 In EPA Letter Dated:  
 SEP 24 2002**  
**Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act,  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
 100-902**



<b>FIRST AID</b>	
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
<p><b>Recommendations for Medical Treatment for Emamectin Benzoate Acute Toxicity:</b> Early signs of intoxication include mydriasis (dilated pupils), ataxia (unsteadiness), and muscle tremors. Toxicity following accidental ingestion of the concentrate can be minimized by inducing vomiting within ½ hour of exposure. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels) as indicated by clinical signs, symptoms, and measurements. In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since emamectin benzoate is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic emamectin benzoate exposure.</p>	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<b>HOT LINE NUMBER</b>	
For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call <b>1-800-888-8372</b>	

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**PRECAUTIONARY STATEMENTS**

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**Hazards to Humans and Domestic Animals**

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses) May be fatal if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove and wash contaminated clothing before reuse.

**Environmental Hazards**

This pesticide is toxic to fish, birds, mammals, and aquatic invertebrates. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans, or other public 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

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**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

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**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. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, Inc. or Seller. 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, subject to the inherent risks referred to above, 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.

This product may be used only to manufacture/formulate other insecticide products registered and labeled for use on head and stem Brassica vegetables, celery, and head lettuce.

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### STORAGE AND DISPOSAL

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

Store in a tightly closed original container in a cool, dry place.

#### **Pesticide Disposal**

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. 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**

##### **Bulk**

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

##### **250 Gal Mini Bulk**

This is a refillable container that must be returned to an authorized Syngenta refilling facility for refilling or disposal.

##### **Other Containers**

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Note:** 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 cleanup procedures and disposal of wastes.

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

Syngenta Crop Protection, Inc.  
Greensboro, North Carolina 27409  
[www.syngenta-us.com](http://www.syngenta-us.com)

SCP 902A-L1(Draft-A)

Z:LABELLE-W/EMATECH902A-L1(DRAFT-A) – ccg – 11/5/01



August 30, 2001 –draft  
revised label to EPA,  
revised first aid statements  
according to PR Notice  
2001-1, revised ingredient  
statement according to new  
CSF and prod. chem,  
revised and added storage  
and disposal statements,  
specified on front panel end-  
use product uses supported  
for this active ingredient.  
Corrected label by adding  
Spanish signal word and  
warning statement, deleted  
chemical name of active –  
common name and CAS no.  
are sufficient, changed all  
references to Novartis to  
Syngenta and replaced  
Warranty statement with  
new Syngenta Warranty  
Statement, changed country  
of origin to Switzerland,  
revised ingredient statement  
per PR Notices 97-5 & 97-6  
Nov. 5, 2001 – draft –  
revised current uses

Z:LABELLE-W/EMATECH902A-L1(DRAFT-A) – ccg – 11/5/01