



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 1 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Carolyn F. Brinkley
Senior Regulatory Product Manager
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419-8300

Subject: Amendment - Add Syngenta Format to Label
Pirimor 50 DF
EPA Registration No. 100-1073
Your Submission Dated January 15, 2003

Dear Ms. Brinkley:

The amendment referred to above, submitted in connection with registration under section 3 (c)(7(B) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below.

1. Revise your "First Aid" statements to be consistent with PR Notice 2001-1:

"IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have a 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 a doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: 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 eyes. Call a poison control center for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice".

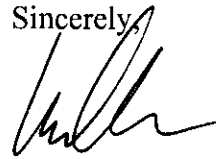
Have the product container with you when calling a poison control center or doctor, or going for treatment. You may also call 1-800-xxx-xxxx for emergency medical treatment information.

2. Revise your "Precautionary Statements" section to read:

"May be fatal if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. May be fatal if absorbed through the skin. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles, faceshield, or safety glasses), clothing and gloves. Remove contaminated clothing and wash clothing before reuse. Harmful if inhaled. Avoid breathing dust. Causes substantial but temporary eye injury. Causes skin irritation."

Stamped copies of the labels are enclosed for your records. If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 7 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
and amendments, for the pesticide
registered under EPA reg. No.
100-1073



| FIRST AID | |
|---|---|
| Immediately start the procedures given below. If further treatment is required, contact a poison control center, a physician, or the nearest hospital. | |
| If swallowed | <ul style="list-style-type: none"> • Immediately give several glasses of water and induce vomiting by placing a finger on the back of the victim's tongue. • Give fluids until vomitus is clear. • Do not give anything by mouth to an unconscious or convulsing person. • Get medical attention. |
| If in eyes | <ul style="list-style-type: none"> • Flush with plenty of water. • Call a physician if irritation persists. |
| If on skin | <ul style="list-style-type: none"> • Wash with plenty of soap and water. • Get medical attention. |
| If inhaled | <ul style="list-style-type: none"> • Remove victim to fresh air. • If not breathing, give artificial respiration, preferably by mouth-to-mouth. • Get medical attention. |
| 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 | |

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Waterproof gloves
- Shoes plus socks

APPLICATION DIRECTIONS**Alfalfa Grown For Seed**

For control of aphids. Apply 2 - 6 oz. of Pirimor® 50-DF/A by ground or aerial application. The higher rate is recommended for instances of heavy infestations of aphids. Spray to wet foliage completely. Minimal application spray volume is 10 gal./A by ground and 5 gal./A by air.

For the most effective and economic control, begin to apply Pirimor 50-DF as soon as aphids appear.

Preharvest Interval (PHI)

A PHI of 1 day is required after application of Pirimor 50-DF.

GENERAL USE PRECAUTIONS

- Pirimor 50-DF is to be applied at a rate not to exceed 6 oz. of product per acre per season.
- Pirimor 50-DF may be applied a maximum of twice per season not to exceed 6 oz. of product per acre per season (i.e., 2 applications at 3 oz. each). For a second application, reapply in no less than 7 - 10 days.
- Do not apply when weather conditions favor drift from treated areas.
- Make ground applications when the wind velocity favors on-target product deposition, (approximately 3-10 mph). Do not apply when wind velocity exceeds 10 mph.
- Do not apply by ground equipment within 25 ft, or by air within 75 ft, of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
- Applicators and alfalfa seed growers are required to report to EPA Headquarters, the EPA Regional Office, and the State Department of Agriculture any adverse effects to birds resulting from the use of this pesticide.
- For aerial applications, the spray boom should be mounted on the aircraft so as to minimize drift caused by wingtip or rotor vortices. The minimum practical boom length should be used and must not exceed 75% of wing span or rotor diameter.
- Ultra Low Volume (ULV) applications are prohibited.
- The largest droplet size consistent with good pest control is required. Formation of very small droplets may be minimized by appropriate nozzle selection, by orienting nozzles away from the air stream as much as possible, and by avoiding excessive spray boom pressure.
- Spray should be released at the lowest height consistent with pest control and flight safety.
- Aerial applications should be made when the wind velocity favors on-target product deposition. Do not apply when wind velocity exceeds 10 mph. Avoid applications when wind gusts approach 10 mph.
- To avoid risk of exposure to sensitive aquatic areas, aerial applicators should avoid application when wind direction is toward aquatic areas.
- Low humidity and high temperatures increase the evaporation rate of spray droplets and therefore the likelihood of increased spray drift to aquatic areas. Avoid spraying during conditions of low humidity and/or high temperature.

Growers' Cooperative Association) located in Malheur, Umatilla, Morrow, Jackson, or Josephine Counties of Oregon.

- Do not apply this product through any type of irrigation system.

Compatibility: Do not use with oxidizing agents.

STORAGE AND DISPOSAL

Prohibitions

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Storage

Store in original container only. Keep container closed when not in use. Do not store near food or feed. In case of spill or leak on floor or paved surfaces, sweep up and remove to chemical waste area.

Pesticide Disposal

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture 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.

Container Disposal

Triple rinse (or equivalent); then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or alternatives allowed by state and local authorities.

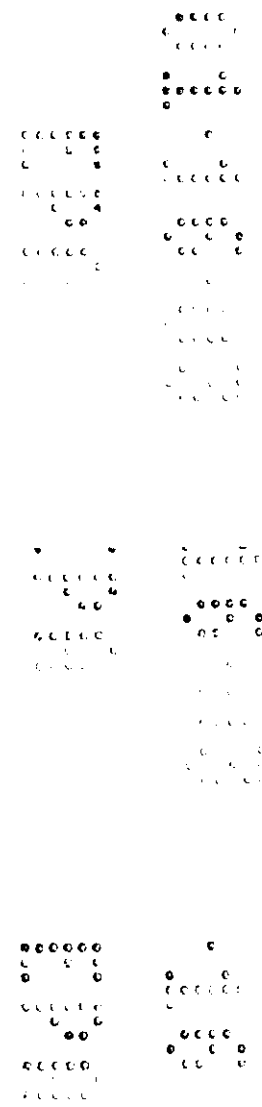
Pirimor® and the Syngenta logo trademarks of a Syngenta Group Company.

©2002 Syngenta

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 1073A-L1 1002
L104831 USA/12F



PIRIMOR®

50-DF

Insecticide

N-Methyl Carbamate

FOR USE ONLY IN IDAHO, MONTANA*, NEVADA, OREGON, UTAH, WASHINGTON, AND WYOMING ON ALFALFA GROWN FOR SEED.

*IN MONTANA, A NONFOOD USE AGREEMENT MUST BE SIGNED WITH THE MONTANA DEPARTMENT OF AGRICULTURE PRIOR TO PURCHASE OF THIS PRODUCT

| | |
|--|--------|
| Active Ingredient: | |
| 2-(dimethylamino)-5,6-dimethyl-4-pyrimidinyl dimethylcarbamate . . . | 50.0% |
| Other ingredients: | 50.0% |
| Total: | 100.0% |

Contains 50 lbs. of active ingredient per 100 lbs.
EPA Reg. No. 100-1073
EPA Est. No. 30564-EN-1
Product of the United Kingdom
SCP 1073A-L1 1002
L104831 USA/12F

2 pounds Net Weight

KEEP OUT OF REACH OF CHILDREN. WARNING/AVISO

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 and directions for use in attached booklet.

FIRST AID

Immediately start the procedures given below. If further treatment is required, contact a poison control center, a physician, or the nearest hospital.

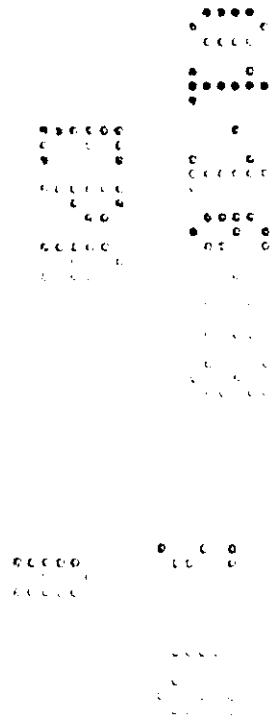
If swallowed: Immediately give several glasses of water and induce vomiting by placing a finger on the back of the victim's tongue. Give fluids until vomitus is clear. Do not give anything by mouth to an unconscious or convulsing person. Get medical attention.

If in eyes: Flush with plenty of water. Call a physician if irritation persists.

If on skin: Wash with plenty of soap and water. Get medical attention.

If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably by mouth-to-mouth. Get medical attention.

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



Pirimor® 50-DF

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals
WARNING

MAY BE FATAL IF SWALLOWED. CAUSES SKIN AND EYE IRRITATION. Avoid breathing dust. Avoid contact with skin, eyes, or clothing.

Environmental Hazards

This pesticide is toxic to birds and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater.

Physical And Chemical Hazards

Do not use or store near heat or open flame.

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.

Container Disposal

Triple rinse (or equivalent); then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or alternatives allowed by state and local authorities.

Do not apply this product thru any type of irrigation system.

Pirimor® and the Syngenta logo trademarks of a Syngenta Group Company.
©2002 Syngenta

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

SCP 1073A-L2 1002
L104830 USA/12F

STORAGE AND DISPOSAL

Prohibitions

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Storage

Store in original container only. Keep container closed when not in use. Do not store near food or feed. In case of spill or leak on floor or paved surfaces, sweep up and remove to chemical waste area.

Pesticide Disposal

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinseate is a violation of federal law. If these wastes cannot

