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

Ms. Jennifer Phillips
Registration Manager
Rhone-Poulenc AG Company
2 T. W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

FEB 04 1997

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Ms. Phillips:

Subject: Ethoprop (Technical Grade)
EPA Reg. No. 264-456
Your Application Dated August 29, 1996

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 one copy of your final printed label incorporating the following correction before you release the product for shipment.

The label must display the front panel word "POISON" in red on a contrasting background.

A stamped copy of the label is enclosed for your records.

Based on the available information, the Agency accepts the revised nominal concentration of 95.9% and your revised Confidential Statement of Formula (CSF) dated August 21, 1996. The available information considered includes the information submitted with your subject application and the previously submitted product chemistry data which were reviewed and accepted in the Agency's letter of June 19, 1995.

It is understood that, as stated in your letter of August 20, 1996, the technical material used in your toxicity studies to support reregistration of ethoprop is essentially the same as that being manufactured today.

Further, it is understood that there have been no changes in the manufacturing process of the subject technical material since the previously accepted CSF dated November 3, 1988.

Sincerely,

William W. Jacobs, Ph. D.
Acting, Product Manager Team 14
Insecticide-Rodenticide Branch
Registration Division (7505C)

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ETHOPROP (Technical Grade)

ACTIVE INGREDIENTS:

Ethoprop: (O-Ethyl S, S-Dipropyl Phosphorodithioate) 95.9%

INERT INGREDIENTS:..... 4.1%

EPA Reg. No. 264-456

EPA Est. No. 264-TN-1



**KEEP OUT OF REACH OF CHILDREN
DANGER POISON
PELIGRO**



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

TRANSLATION TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.

For **PRODUCT USE** Information Call 1-800-334-9745

For **MEDICAL** And **TRANSPORTATION** Emergencies **ONLY** Call 24 Hours A Day 1-800-334-7577

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Give 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Call a physician, Poison Control Center, or hospital emergency room. If not breathing, give mouth to mouth artificial respiration.

CASE OF SKIN CONTACT: Immediately remove all contaminated clothing, and wash skin with soap and water. Get medical attention. Wash clothing before reuse. Discard contaminated shoes. Get medical attention.

FOR EYES: Flush with plenty of water for at least 15 minutes. Call a physician immediately in all cases of suspected poisoning.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration. Get medical attention.

Persons providing first aid should prevent contamination of themselves.

RECORDED
ALL COMMENTS
IN EPA LABORATORY
FEB 04 1997
264-456

PRECAUTIONARY STATEMENTS

DANGER

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Fatal if swallowed, inhaled or absorbed through skin. Rapidly absorbed through skin. This product is a skin sensitizer. Wear waterproof protective clothing, rubber gloves and goggles. In case of contact, wash immediately with soap and water. Poisonous if absorbed through the eyes. Do not get into eyes, on skin or on clothing.

Do not breathe fumes or spray mist. Wear an AO R-6058 respirator with an R-58 cartridge, or equivalent, for protection. After use, wash hands, arms and face thoroughly with soap and warm water before eating or smoking. Wash all clothing with soap and hot water before reuse. Discard contaminated shoes. Do not contaminate feed or food.

Do not store in or around the home.

SYMPTOMS OF POISONING: Nausea, vomiting, abdominal cramps, diarrhea, excessive salivation, headache, dizziness, weakness, blurring or dimness of vision, excessive tearing, loss of muscular coordination, slurring of speech, twitching of muscles (especially of tongue and eyelids), mental confusion, disorientation, drowsiness, difficulty in breathing (chest tightness), runny nose.

NOTE TO PHYSICIAN

This product is a cholinesterase inhibitor. Severe symptoms and signs include diarrhea, pinpoint and non-reactive pupils, respiratory difficulty, pulmonary edema, cyanosis, loss of sphincter control, convulsions, and coma. Support respiration as needed. Measures should include removal of secretions, maintenance of a patent airway, and if necessary, artificial ventilation.

If cyanosis is absent, give ATROPINE 2-4 mg intravenously (0.05 mg/kg for children). Repeat atropine at 5-10 minute intervals until atropinization occurs (dry, flushed skin, tachycardia, pupillary dilatation), and maintain for 48 hours.

If cyanotic, give initial atropine intramuscularly and start measures to improve ventilation. Start 2-PAM (PROTOPAM, Ayerst) at the same time. Give 1-2 grams PROTOPAM (20-40 mg/kg for children) in 100cc saline over 15-30 minutes. If pulmonary edema is present, give intravenously slowly as a 5% solution in water over a period of at least 5 minutes.

A second dose may given after one hour if muscle weakness persists. Additional doses may be given cautiously for persistent muscle weakness. May be given by intramuscular or subcutaneous routes if intravenous administration is not feasible.

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In case of skin contact, wash patient with soap and water followed by wash with 95% ethyl alcohol. Keep patient under constant observation for 24-36 hours. Symptoms may persist for one month. The use of theophylline, morphine, barbiturates, phenothiazines, reserpine, and succinyl choline is contraindicated.

Allow no further exposure until cholinesterase regeneration has taken place as determined by blood tests. Repeated exposure to cholinesterase inhibitors may, without warning, cause increase susceptibility to very small doses of any cholinesterase inhibitor. This will last for several weeks following exposure.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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.

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/Nematicide, for

(1) The Following Uses:

Terrestrial non-domestic, food uses on: bananas, beans (dry, lima, snap), cabbage, corn (field and sweet), cucumbers, peanuts, pineapples, plantain, potatoes (white, Irish), sugarcane, and sweet potatoes.

Terrestrial non-domestic, non-food uses on: citrus seedlings, commercial turf, ornamentals and tobacco.

(2) Uses for Which USEPA has Accepted the Required Data and/or Citations of Data that the Formulator has Submitted in Support of Registration and (3) Uses for Experimental Purposes that are in Compliance with EPA Requirements.

STORAGE AND DISPOSAL

STORAGE

Do not contaminate water, food, or feed by storage or disposal. Do not store in or around the home.

Do not use, pour, spill or store near heat or open flame. Do not store below 32°F.

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 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 dispose of in sanitary landfill, or by other procedures approved by state and local authorities.

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DISCLAIMER AND INDEMNITY FOR FORMULATORS' USES

THE MANUFACTURER EXPRESSLY DISCLAIMS ALL LIABILITY FOR CLAIMS AND ACTIONS (WHETHER BASED ON CONTRACT, TORT, STRICT LIABILITY OR BREACH OF WARRANTY) ARISING OUT OF, RESULTING FROM OR CONNECTED WITH A FORMULATION CONTAINING THIS PRODUCT WHEN USED FOR ANY PURPOSE OTHER THAN THOSE USES SET FORTH IN (1) ABOVE. THE MANUFACTURER HAS NOT DEVELOPED SCIENTIFIC DATA TO SUPPORT, NOR HAS IT EXPLICITLY OR IMPLICITLY APPROVED, ANY USES OTHER THAN THOSE IN (1) ABOVE.

ANY FORMULATOR OR BUYER WHO USES THIS PRODUCT IN FORMULATIONS FOR ANY USE OTHER THAN THOSE STATED IN (1) ABOVE ASSUMES ALL LIABILITY FOR CLAIMS AND ACTIONS ARISING OUT OF, CONNECTED WITH OR RESULTING FROM SUCH USE AND AGREES BY SO USING THIS PRODUCT TO INDEMNIFY AND HOLD HARMLESS THE MANUFACTURER FROM SUCH CLAIMS AND ACTIONS.

THIS DISCLAIMER AND INDEMNITY IS IN ADDITION TO, NOT IN LIEU OF, THE BELOW DISCLAIMER AND LIMITATIONS.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants that this product conforms to the chemical description on the label; that this product is reasonably fit for the purposes set forth in item (1) of the Directions for Use when it is used in accordance with such Directions; and that the statements under item (1) of the Directions, the warnings and other statements on this label, other than the suggested uses under items (2) and (3) of the Directions, are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and of residues on food crops and upon reports of field experience. Tests have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS, OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States. Seller's guarantee shall be limited to the terms set out on the label and subject thereto, the buyer assumes the risk to persons or property arising from the use or handling of this product on that condition.

Rhône-Poulenc Ag Company
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709
ETHOPROP (Technical Grade) (PENDING) Submitted 7/26/95.

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