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JUL 3 1 1992

Dr. Charles S. Baer
E. I. du Pont de Nemours & Co.
Barley Mill Plaza, Walker's Mill Building
P. O. Box 80038
Wilmington, DE 19880-0038

Dear Dr. Baer:

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Subject: Revised labeling; Acute Toxicity Studies
Du Pont Methomyl Composition
EPA Reg. No. 352-361
Your submissions dated July 30, 1991 and Oct. 29, 1991

Revised labeling referred to above, submitted in connection with reregistration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comments:

- 1. Deletion of use on watercress is acceptable.
- 2. We concur with your rationale for waiver from eye irritation testing based on mortality in the rangefinding study, and an eye irritation test is not required at this time. Toxicity category I for primary eye irritation is assumed for this product.
- 3. The primary dermal irritation study is not acceptable and must be repeated because the test animals used in this study were simultaneously used in a dermal irritation for Methomyl Technical. This practice is in violation of Good Laboratory Practices (GLP). Further reuse of test animals in acute toxicity will lead to a supplementary classification of the study and result in the study having to be repeated.
- 4. The dermal sensitization study is acceptable as core guideline data and this product is considered a non-sensitizer.
- 5. You need to submit or cite the following studies for this product: acute oral toxicity, acute inhalation toxicity, primary skin irritation.

- 6. Revise the first sentence under Precautionary Statements to read as follows: "May be fatal if swallowed, inhaled or absorbed through skin or eyes."
- 7. Under Important Notice to Handlers the term "goggles" should be changed to "goggles or face shield". Also change the last sentence to read: "Wash thoroughly after handling and before eating, drinking or using tobacco. Remove and wash contaminated clothing before reuse."
- 8. The Statement of Practical Treatment for eye and skin exposure should be revised to add: "If in eyes: Call a physician or poison control center immediately."
- 9. Add "Get medical attention." or "Call a physician or poison control center." to statement of practical treatment for inhalation exposure.

Submit five (5) copies of final printed label before you release the product for shipment bearing the amended labeling.

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

Sincerely yours,

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Dennis H. Edwards, Jr. Product Manager (19) Insecticide Rodenticide Branch Registration Division (H7505C)



NET 50 kg (110.23 LBS.) LANBAW... IE PES [90% METHOMYL]

METHOMYL COMPOSITION

An Insecticide for Formulating Use Only

INGREDIENT STATEMENT

ACTIVE HIGREDIENTS: Methomyl

Keep out of reach of children POISON DANGER

STATEMENT OF PRACTICAL TREATMENT

of contact, wash skin with planty of soap and water, for eyes. Buth with water for 15 and get medical apprison, remove and wish contempted clothing before reuse

ATTOPINE IS AN ANTIDOTE — SEEK MEDICAL ATTENTION
AT ONCE IN ALL CASES OF SUSPECTED PORCHAND

is appear (see WARNING SYMPTOMS in apposite column), get medical

organicles involving this product, call toll free 1-800-441-3637.

STORAGE AND DISPOSAL

BTORNAGE: Store product in original container only, away from other pe scides, fertilizer, or feed. Not for use or storage in or around the nome.

POBAL: Do not contaminate teath, loud or feed by storage or depos. I Pesticide wester acutely hazardous improper disposal of excess pesticide, spray mixture or installe is a wolletion federal Law III Pleas westers cannot be deposed of by use eccording to label instructions, sect your State Passicide or Environmental Combol Agency, or the Hazardous Weste represenacularly hazardous improper disposal of excess per returns Law III hisses wastes cannot be disposed but your State Prescude or Environmental Control to at the reseast EPA Regional Office for guidance

Completely empty line by shisting and sagring sides and bottom to loosen clinging particles. Empty residue vito formula wirequipment. Their dispose of lines in a sanitary lendfull or by increateon if allowed by states and local a whiteles. If thi miles containinated and cannot be reused, dispose of any the same rearring.

IMPORTANT -- NOTICE TO HANDLERS

DO NOT SET IN EYES, ON SAIN, ON ON CLOTHING. REFORE OPENING DRUM PUT ON PROTECTIVE CLOTHING, SOCIES, ALID A MASK OR RESPIRATOR JOINTLY APPROVED BY THE MINE'S VETY AND HEALTH ADMINISTRATION (PORMERLY THE U.S. BUREAU OF MINES) AND BY THE NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH. WEAR CLEAR CLOTHING DARY, WASH THOROUGHLY AFTER HANDLING AND BEFORE EXTEND OR MINORING.

Technical information for this product is available from the manufacturer on request

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

POISON 奥

MAY BE FATAL IF SWALLOWED OR ABSORBED THROUGH THE EYES.
POISONOUS IF INHALED.
Do not breathe vepors. Do not get in eyes, on shir, or on clothing.
NOTE TO PHYSICIAN

morphose or 2-PMM. However for exposure to mediciny/ and organight

ENVIRONMENTAL HAZARD STATEMENT

This product is tose: to figh, funds and other widthle. Keep out of any body of retige Do not continued within by country of equipment or designed of senters. Do not decrease white containing this product into label, streets, broken is submit, occasing, or public extern unless the product is specifically determined and addressment in the NPDES serms. Do not discharge effecting containing this product is server systems welvour previously notifying the semage restment authority for guidance, contact your State Water Boarde or Regional Office of the Chips of Disc of the Chips.

PHYSICAL AND CHEMICAL HAZARDS

DIRECTIONS FOR USE irs using this product are responsible for obtaining EPA registration of the sea responsible products extended only for the following

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e Food Crups: 10Mais, bull populars

e Nonfood Creps: orner

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E. I. DU PONT DE NEMOURS AND COMPANY, AGRICULTURAL PRODUCTS, WILMINGTON, DELAWARE

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