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DEC 17 1990

Mr. Timothy Stoner
Registration Specialist
Du Pont Agricultural Products
P.O. Box 80038
Wilmington, DE 19880-0038

Dear Mr. Stoner:

Subject: Tetrachlorvinphos Reregistration Standard; Product
Chemistry Data; Acute Toxicity Data; Upgraded Labeling
Du Pont Technical Rabon
EPA Registration No. 352-460
Your Submissions Dated August 31, 1989, February 1, 1990
and February 28, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

With respect to the acute toxicity data submitted we have the following comments:

Acute oral, acute dermal, eye irritation, and dermal irritation are acceptable and have been assigned the following toxicity categories:

<u>Exposure route</u>	<u>Toxicity Category</u>
Oral Toxicity (81-1)	III
Dermal Toxicity (81-2)	III
Eye Irritation (81-4)	III
Dermal Irritation (81-5)	IV

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12-10-90

The Agency has reviewed all the data relevant to the dermal sensitization capacity of the subject product and concludes that at least under some circumstances this product can elicit a dermal sensitization reaction. This conclusion was based primarily upon the results reported for the study conducted at Wil Research Laboratories. This study is classified as core minimum data. However since the study conducted at Leberco Testing did not indicate that the subject product was a potential dermal sensitizer the Agency will reconsider the need for a label precaution provided you submit the following additional information on the study conducted at Leberco Testing Inc:

- a. Test samples #8813 and #8814 are each identified (p. 33) as containing 97.0% "Technical Rabon" and 3.0% "Inert Ingredients." This reporting does not give the actual Rabon content (if the technical material is 99% Tetrachlorvinphos, then the test material contained approximately 96% of this active) which should be provided. Some further identification of the "inert ingredients" should also be given.
- b. There is inadequate reporting as to when the induction exposures were made and the amount of time between them. We should have this information.
- c. On page 10 of the report it is stated that "site reactions are graded on a scale of 1 (slight erythema/edema) to 4 (marked erythema/edema)." However, a complete scoring system (including criteria for scores of 2 and 3) is not reported. This should be provided.
- d. A reference or its equivalent should be provided for the method used.

Attached for your information are copies of the Agency's reviews of this data.

Based on the Product Chemistry Review of your product we have the following comments:

a. Section 62-3. Enforcement Analytical Methods

Data regarding enforcement analytical methods for the active ingredient and impurities do not satisfy this requirement because complete validation was not provided. To fulfill this requirement provide accurate data on the methods which are used for determination of the active ingredient and each impurity that is determined to be toxicologically significant.

b. All other data are acceptable.

Make the following label changes:

1. Revise the active ingredient statement as follows:

Tetrachlorvinphos: 2-chloro-1-(2,4,5-trichlorophenyl) vinyl dimethyl phosphate%

2. In the directions for use, the statement should read:

"Formulators using this product are responsible for obtaining EPA registration of their formulated product."

3. In the directions for use, this statement regarding acceptable use patterns must appear:

"For formulation into end-use insecticides products intended only for (list acceptable sites)."

Note: No use may be included on the label where the registrant fails to agree to comply with the data requirements for that use pattern.

4. Since detailed instructions for formulating are not provided on the label, add:

"Refer to attached Technical Bulletin for formulating and other information."

Note: The technical bulletin must be submitted with the product label for Agency review.

5. The following statements are required under "Environmental Hazards":

"This pesticide is highly toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination System (NPDES) permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or the Regional Office of EPA."

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

Sincerely,

George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7505C)

cc: Joane Edwards, Registration Division

5 of 5



ACCEPTED with COMMENTS in EPA Letter Dated:

TECHNICAL RA

ACCEPTED with COMMENTS in EPA Letter Dated:

JUN 17 1988

INSECTICIDE

An Insecticide for formulating use only

JUN 14 1988

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 352-460

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 352-460

ACTIVE INGREDIENTS 2-Chloro-1-(2,4,5-trichlorophenyl) vinyl dimethyl phosphate
INERT INGREDIENTS

EPA Reg. No. 352-400 EPA Est. No. 352-AL-1

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

If swallowed, drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious person.

If inhaled — remove victim to fresh air. Apply respiration if necessary.

If on skin — remove contaminated clothing and wash affected areas with soap and water.

If in eyes — flush eyes for at least 15 minutes with water. Call a physician if irritation persists.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

CAUTION. Harmful if swallowed. Avoid breathing dust. Do not get in eyes, on skin or on clothing. Avoid prolonged contact with skin. Wash thoroughly with soap and water after handling and before eating and smoking.

For medical emergencies involving this product, call toll free 1-800-441-3637.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with the NPDES permit. For guidance contact your Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This pesticide may be used only for the formulation of other pesticides. The registrant and its agents are responsible for providing data to support the labeling of this product.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Storage and disposal prohibited. Do not reuse empty container.

STORAGE: Store in a dry place in original container with large amounts of water. Decontaminate areas with dilute solution of alkali (less than 5%) and detergent. In case of significant spill, call CHEMTREC (800) 424-9300.

PESTICIDE DISPOSAL: Pesticide that cannot be used should be disposed of at an approved waste disposal site.

CONTAINER DISPOSAL: Completely empty liner by turning bottom to loosen clinging particles. Empty residues of liner in a sanitary landfill or by incineration, if allowed. Dispose of drum in the same manner.

NOTICE OF WARRANTY

DUPONT COMPANY MAKES NO WARRANTY OF MERCHANTABILITY FOR ANY PURPOSE, OR OTHERWISE, EXPRESS OR IMPLIED, WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER THE STATEMENTS MADE ON THIS LABEL.

Net Weight: 200 pounds

G-2158 8077/1/97

E. I. DUPONT DE NEMOURS & CO. (INC.), AGRICULTURAL PRODUCTS DEPARTMENT, WILMINGTON, DE