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AUG 11 1986

Raymond A. Cardona, Ph.D.
Manager, Registration and Toxicology
Uniroyal Incorporated
74 Amity Road
Bethany, CT 06525

Dear Dr. Cardona:

Subject: Disulfoton Registration Standard
Terraclor Super X Granular With Di-Syston
EPA Registration No. 400-408
Your Letters Dated March 6 and April 25, 1985, and February 21, 1986

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

Our files indicate that the following must be submitted in order to complete the information requirements of the Disulfoton Registration Standard under the Federal Insecticide, Fungicide, and Rodenticide Act:

- Certification With Respect To Citation of Data 3(c)(1)(D) Form.
Please refer to PR Notice 85-3 for instructions, and submit Form to this office.

In addition, a review of the documents that have been submitted reveals that the following changes and/or information must be made and submitted to this office.

1. The Confidential Statement of Formula (CSF) indicates a solvent different than that indicated with the Manufacturing Process. The solvent must meet the requirements of 40 CFR 172.884. The solvent indicated in the Manufacturing Process does meet these requirements. Please clarify which solvent you are using.

86096:Shell:LR-10:KENCO:6/16/86:6/20/86:eg:VO

R:86142:Shell:LR-10:KENCO:7/28/86:8/5/86:dej:LMF

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

2. The upper Certified Limits you have provided indicate the following overformulation:

23% PCNB
23% Disulfoton
61% Terrazole

3. Provide the actual data for the Storage Stability study. Please note the minimum length of this study is 1 year at room temperature.
4. Under the active ingredients, the common name "Disulfoton" should precede the chemical name. It should read "Disulfoton: O,O-Diethyl S-[2-(ethylthio)ethyl]phosphorodithioate."
5. The Child Hazard Warning should be followed by the wording:

(Skull & Crossbones) DANGER - POISON (Skull & Crossbones)

These symbols and words should all be in red ink.

6. The wording, "See Left Side Panel For Additional Precautionary Statements" should precede the "Statement of Practical Treatment" section.
7. Add a street address or post office box number along with the company name and city/State.
8. Revise the second paragraph, first sentence, to read "While transferring material from package to equipment, and during mixing/loading/application operations, wear a hat, goggles, face shield or equivalent, gloves (cotton or natural rubber), long-sleeved shirt, long pants, socks, shoes, and a pesticide respirator jointly approved by the Mine Safety and Health Administration and by the National"
9. Immediately beneath the statement "Restricted Use Pesticide" add "Acute Human Oral, Dermal, and Inhalation Toxicity." Also expand the sentence "For Retail Sale xxx," to include "xx and only for those uses covered by the certified applicator's certification." The above revisions were requested in the Disulfoton Registration Standard.
10. The "REENTRY STATEMENT" wording must follow the "misuse statement" under the Directions for Use section.

Should you have any questions regarding this letter, please contact Jim Shell or me.

For future reference EPA Accession No. 259105 has been assigned to the acute toxicity and product chemistry data.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosure

RESTRICTED USE PESTICIDE

For retail sale to and application only by certified applicators or personnel under their direct supervision.

TERRACLOR Super X

GRANULAR
SOIL FUNGICIDE

WITH Di-Syston
SYSTEMIC INSECTICIDE

ACCEPTED
WITH COMMENTS
EPA Letter Dated

AUG 11 1986

UNIROYAL

COMPOSITION

Active Ingredient: (% by weight)	
Pentachloronitrobenzene	6.50%
5-Ethoxy-3-(trichloromethyl)-1,2,4-thiadiazole	1.63%
O,O-Diethyl S-[2-(ethylthio) ethyl] phosphorodithioate*	6.50%
Inert Ingredients	85.37%
Total	100.0%

*U.S. Patent No. 2,759,010

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

DANGER

Poisonous if swallowed, inhaled, or absorbed through the skin. Rapidly absorbed through the skin. Do Not Breathe Dust. Do Not Get In Eyes, On Skin, Or Clothing. In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water. Wear freshly laundered long-sleeve work clothes daily. Wash thoroughly with soap and water before eating or smoking. Bathe at the end of the work day and change outer clothing.

While transferring material from package to equipment, wear a clean cap, goggles, gloves (cotton or rubber) and a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11. If cotton gloves are used, they must be laundered or discarded after each day's use. Rubber gloves should be washed with soap and water after each use. Do not wear the same gloves for other work. Destroy and replace gloves frequently. Keep all unprotected persons out of the operating area. The following protective clothing are required during mixing/loading operations: gloves, long-sleeved shirt, long pants, socks and shoes.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not apply directly to water or wetlands. Drift and run-off from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes. Cover or incorporate spills. This pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

REENTRY STATEMENT

Do not allow reentry into treated fields within 24 hours of application unless appropriate protective clothing is worn.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

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

STORAGE: Store in a dry location.

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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

KEEP OUT OF REACH OF CHILDREN

DANGER

POISONOUS IF SWALLOWED, INHALED OR ABSORBED
THROUGH THE SKIN. RAPIDLY ABSORBED THROUGH SKIN.
ATROPINE IS AN ANTIDOTE FOR DI-SYSTON.
CALL A PHYSICIAN IMMEDIATELY IN ALL CASES
OF SUSPECTED POISONING.



POISON



STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush with plenty of water. Call a physician immediately.

NOTE TO PHYSICIAN: ANTIDOTE: Administer atropine sulfate in large therapeutic doses. Repeat as necessary to the point of tolerance. 2-PAM is also antidotal and may be administered in conjunction with atropine.

Compound inhibits cholinesterase resulting in stimulation of the central nervous system, the parasympathetic nervous system, and the somatic motor nerves. Do not give morphine. Watch for pulmonary edema, which may develop in serious cases of poisoning even after 12 hours. At first sign of pulmonary edema, the patient should be placed in an oxygen tent and treated symptomatically.

SEE LEFT SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT

UNIROYAL CHEMICAL COMPANY, INC.

Middlebury, CT 06749

EPA REG. NO. 400-408

EPA EST. NO.

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NET WEIGHT:

Lot. No.

2-1-85

DIRECTIONS FOR USE ON COTTON

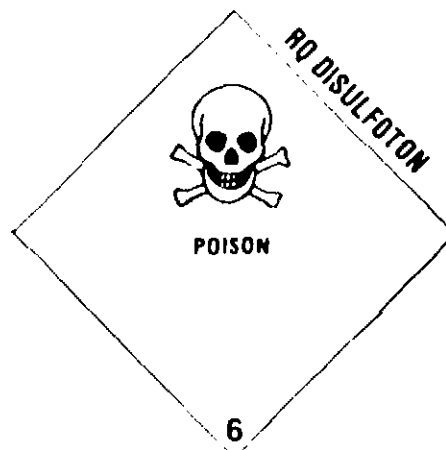
For control of Seedling Disease Complex - Rhizoctonia, Pythium and Fusarium and for early season control of thrips, aphids and mites.

Apply as a soil in-furrow application at planting time with a granular pesticide applicator properly calibrated to assure accurate placement and proper dosage.

Application Method	Lbs./drill row per acre	Lbs./1300 linear feet of row based on 40 inch spacing
DRILL PLANTING	15	1.5
HILL-DROP PLANTING	5	0.5

Soil temperature, moisture and tilth should be favorable for good germination and emergence. Systemic insecticides can possibly damage seed germination when placed on or very near the seed, however, the addition of a fungicide such as Terraclor Super X, considerably lessens this hazard. Do not allow the feeding or grazing of cotton foliage by livestock. Do not plant treated fields to any crop other than cotton.

IMPORTANT NOTICE — Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product, contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.



**ORGANIC PHOSPHATE COMPOUND
MIXTURE DRY.**

**DO NOT SHIP WITH OR STORE
NEAR FEED OR FOODSTUFFS.**

DOT E6296

*DI-SYSTON is a Registered Trademark of the Parent Company of Farbenfabriken Bayer GmbH, Leverkusen.