



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

OCT 19 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Willard F. Cummings
U.S. Registration Manager
Crop Protection, R & D
Crompton Corporation
74 Amity Road
Bethany, CT 06524-3402

Subject: EPA Reg. No. 400-480
Bifenazate Technical
Label and Confidential Statement of Formula Changes
Letter dated July 20, 2004

Dear Mr. Cummings:

The label and Confidential Statements of Formula (CSFs) changes for the product referred to above, submitted in connection with the registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you do the following:

1. Replace "Berries, citrus, currants, dates, figs and persimmons" under the "Directions for Use" on the label with "non-bearing berries, citrus, currants, dates, figs and persimmons."
2. Submit two CSFs: one marked as Alternate Formulation #1 for the Bifenazate Technical produced in Czech Republic and the other marked as Alternate Formulation #2 for the Technical produced in India. Even though the same manufacturing process is used at both locations, due to the different sources of raw materials used and the site-to-site qualitative and quantitative variations in impurities (though within acceptable levels), the two sites require two separate CSFs. The current active CSF dated 11/15/99 on file is for the basic formulation produced at the Uniroyal plant at Bethany, CT. You may replace the CSF for the basic formulation with one of the alternate formulations, if you so desire.

EPA Reg. No. 400-480 contd

A stamped copy of the draft label is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment. Should you have any questions, do not hesitate to contact the reviewer of this product, Mr. S. Oonnithan at 703-605-0368.

Sincerely,

A handwritten signature in black ink, appearing to read 'D.C. Kenny', with a stylized flourish at the end.

Daniel C. Kenny
Product Manager (01)
Insecticide Rodenticide Branch
Registration Division (7505C)

Encl.

Bifenazate Technical

Crompton

Unifroyal Chemical

ACTIVE INGREDIENT: (% by weight)

Bifenazate: Hydrazine carboxylic acid, 2-(4-methoxy-[1,1-biphenyl]-3-yl)-1methylethyl ester..... 96.7%

INERT INGREDIENTS: 3.3%

TOTAL: 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 19 2004

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not contaminate water when disposing of equipment washwaters. 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.

PHYSICAL or CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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

400-480

EMERGENCY ASSISTANCE:

CROMPTON EMERGENCY PHONE

800-292-5898

SAFETY DATA AND INFORMATION

203-573-3303

TRANSPORTATION EMERGENCY (CHEMTREC)

800-424-9300

STORAGE AND DISPOSAL

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

STORAGE: Store in a dry location.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Fiber cartons with liners or bags: Completely empty liner or bag by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of liner or bag in a sanitary landfill or by incineration if permitted by State and local authorities. Dispose of carton in same manner.

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 acaricides (1) for use on Ornamentals, Berries, Citrus, Cotton, Cucurbits, Currants, Dates, Figs, Fruiting vegetables, Grapes, Hops, Mint, Nectarines, Okra, Peaches, Persimmons, Plums/prunes, Pome fruit and Tree nuts; (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 USEPA requirements.

This product is for use only by formulators in the manufacture of agricultural acaricidal product(s) offered for sale to the public, and which are duly registered with the Environmental Protection Agency, Washington, D.C. Formulators using this product are responsible for obtaining EPA registration for their formulated product(s).

Detailed information on chemical and physical properties and other formulation recommendations for BIFENAZATE are available upon request from Crompton. Obtain and read this information before undertaking the formulation of BIFENAZATE in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Crompton. Any variance from the federally registered labeling for products containing BIFENAZATE will have to be supported by data provided by the formulator.

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 not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

Crompton Manufacturing Company, Inc., Middlebury, Connecticut 06749

EPA Registration No. 400-480

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