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Systems Integration Group, Inc.



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

JUN 18 1999

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Sharon M. Johnston
AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Subject: SBP-1382 / Chlorpyrifos Transparent Emulsion Concentrate 3.2%-
16% LO
EPA Reg. # 432-718
label amendment submitted 11/26/97
accepted with comments

Dear Ms. Johnston:

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

1) According to your Confidential Statement of Formula (CSF) this product contains > 10% petroleum distillate. This requires changes to the ingredients and first aid sections.

a) Following the ingredients list add "contains petroleum distillate."

b) Replace the current "If swallowed" first aid directions with the following text:

"IF SWALLOWED: Call a physician or poison control center immediately. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol."

2) The following sentence must be added to the section that begins "This product may NOT be used for" Place this sentence at the end of the section after the list of sites.

"All manufacturing-use products produced from this product must bear a statement prohibiting formulation of such products for the uses identified above."

3) Correct typographical error at end of site list. Term is "Paint additives."

Please submit three (3) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of your label stamped "accepted with comments" is enclosed for your records.

Sincerely yours,



Thomas C. Harris
Insecticide / Rodenticide Branch
Registration Division (7505C)
Office of Pesticide Programs

enclosure

SBP-1382®/CHLORPYRIFOS TRANSPARENT EMULSION** CONCENTRATE 3.2%-16% LO

- * FOR PRESSURIZED SPRAYS
- * 7.49 lb/gal (898 g/L)
- * FOR THE FORMULATION OF INSECTICIDES ONLY
- * NOT FOR RESALE UNDER THIS LABEL
- * CONTAINS DURSBAN® INSECTICIDE

ACTIVE INGREDIENTS:

- *Resmethrin [5-(phenylmethyl)-3-furanyl] methyl 2,2-dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate 3.20%w/w
- ‡Chlorpyrifos [0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl)phosphorothioate] 16.00%

INERT INGREDIENTS:..... 80.80%
100.00%w/w

*Cis/trans isomers ratio: max. 30%(±)cis and min. 70%(±)trans.
‡Roussel Uclaf Corporation's SBP-1382® brand of resmethrin insecticide.
‡U.S. Patent No. 3,244,586 Dursban - Trademark of the Dow Chemical Co.
**U.S. Patent No. 3,683,078

EPA REG. NO. 432-718

EPA EST. NO.

WARNING

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Drink 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 or convulsing person.

IF IN EYES: Flush with plenty of water. Get medical attention.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine only by injection is an antidote. Aspiration hazard may exist with this product.

See Side Panel For Additional
Precautionary Statements

NET CONTENTS:

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUN 18 1999

Agrevo Environmental Health
ROUSSEL UCLAF
Roussel Uclaf Corporation
95 Chestnut Ridge Road
Montvale, NJ 07645
718 072694tk

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 432-718

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

WARNING

May be fatal if swallowed. May be fatal if absorbed through skin or clothing. Avoid breathing of vapors. Wash thoroughly after handling. Do not wear contaminated clothing. Keep away from food, feedstuffs and water supplies.

Environmental Hazards

This pesticide is extremely toxic to fish, birds and other wildlife. 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 NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying in writing the sewage treatment plant authority. For further guidance, contact the nearest EPA Regional Office.

Physical And Chemical Hazards

DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME. Flash point minimum of 85°F (4.5°C).

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for formulating use only. The formulator using this concentrate is fully responsible for obtaining EPA registrations for his formulated products. For information on formulating this concentrate, refer to Technical Bulletin #718. ~~insert Hazardous~~
This product may be formulated into end-use products intended for the following acceptable uses: Domestic Indoor (Household), Domestic Outdoor (Household/Ornamental), Indoor Food Handling Establishments (Edible product areas), Greenhouse Ornamentals, Greenhouse Vegetable for minor use application, Mosquito Control, Commercial Industrial Use, Animal Treatments and holding areas, stored grain, agriculture cropland, foraging areas and grazing land (agricultural sites) and uncultivated nonagricultural areas.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Storage:** This material may stratify upon standing, even at room temperature. Thoroughly mix before each use. Do not expose to temperatures below 40°F (4.5°C). If exposed to temperatures below 40°F (4.5°C), allow to stand until product reaches room temperature and thoroughly mix before using. **DO NOT USE OPEN FLAME.**
Pesticide Disposal: Pesticide wastes are toxic. 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 offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and Local authorities.

WARRANTY STATEMENT

Our recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

ATTACHMENT A

This product may be used **ONLY** for formulation into an insecticide for the following uses:

Ornamentals (Outdoor and Nursery) (Terrestrial Nonfood Crop) (Greenhouse Non-food Crop) (Indoor): Outdoor and field grown ornamentals (including, but not limited to flowers, shrubs, evergreens, vines, shade and flowering trees, and non-bearing fruit, nut, and citrus trees); perennial grass seed crops, potted, containerized or balled and burlapped nursery stock plants; annual and perennial plants; houseplants.

Tree and Forest Pests (Forestry) (Domestic Outdoor): Nurseries, plantations, felled trees, shade and flowering trees and Christmas tree plantations; cut stumps.

Turf and Other Outdoor Areas (Domestic Outdoor) (Terrestrial Nonfood Crop): Including, but not limited to golf courses, lawns and other ornamental and recreational turfgrass areas and non-crop areas such as roadsides, footpaths and trails, picnic and camping sites, parks and other recreational areas, sod farms and commercial turfgrass areas, and ant mounds.

Pest Control on Outside Surfaces and Around Buildings (Domestic Outdoor): Perimeter Treatments (applied to and around outside surfaces of residential and non-residential buildings and structures, including, but not limited to) crawl spaces, decks, driveways, eaves, fences, foundations, garages, patios, refuse dumps, walkways, walls, window and door frames, wide area and general outdoor treatment (for flying insects), baits and soil treatments.

Wood or Wood Structure Protection Treatments (Domestic Indoor or Outdoor): General surface and localized injection to residential and non-residential buildings and structures including but not limited to wood surfaces, voids and channels in damaged wood, gaps between wooden members, wall voids, junctions between wood and foundation; underground utility cables and conduits; fence posts and utility poles.

Pest Control Indoors (Indoor): Crack and crevice, spot and bait treatments in and around residential and non-residential buildings and structures including food-handling establishments, including, but not limited to apartment buildings, bakeries, bottling facilities, breweries, cafeterias, food manufacturing plants, food processing plants, food service establishments, granaries and grain mills, hospitals, hotels, houses (including crawl spaces), industrial buildings, kitchens, laboratories, mausoleums, mobile and motor homes, offices, restaurants, schools, stores, warehouses, wineries, and vehicles.

Pets and Domestic Animals (Indoor): Pet collars, cattle ear tags, animal housing including but not limited to pet kennels, poultry houses, and livestock housing (corrals, stockyards, holding pens and other outdoor livestock holding areas).

This product may **NOT** be used for formulation into manufacturing-use or end-use products for the following uses:

Pest Control Indoors (Indoor): Indoor broadcast use; total release foggers for indoor residential and non-residential (except greenhouse) use; coating products intended for large indoor surface areas such as floors, walls, and ceilings inside residential dwellings, offices, schools, or health care institutions including, but not limited to, houses, apartments, nursing homes and patient rooms in hospitals.

Pets and Domestic Animals (Indoor): Animal dips, sprays, shampoos, dusts.

Aquatic Uses (Aquatic Food Crop) (Aquatic Non-Food): Any aquatic use, including mosquito larvicide.

Pest Control Indoors or Outdoors (Domestic Indoor or Outdoor): Pain additives; application in sewer manholes