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JAN 20 1987

Mr. Ralph L. Riggs Stauffer Chemical Company 1200 South 47th Street Richmond, CA 94804

Dear Mr. Riggs:

Subject: Draft Labeling
IMIDAN® 1-E Insecticide
EPA Registration No. 476-2167
Your Submission Dawid April 4, 1986

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:

- 1. Change, "Only for Sale to, Use and Storage by Servicepersons" to read, "Recommended for Agricultural/Industrial Use Only"
- 2. Add the subheading, "STATEMENT OF PRACTICAL TREATMENT" above the practical treatment statements. In addition, the Note to Physician should be placed below the Statement of Practical Treatment.
- 3. The Environmental Hazards statement should be revised to read as follows:

This pesticide is extremely toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water by cleaning of equipment or disposal of wastes. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow in to drift to blooming crops while bees are actively listing the treatment areas.

R:86392:Heyward:LR-1:KENCO:12/18/86:2/2/87:tar:VO R:91931:Heyward:LR-1:KENCO:1/15/87:2/26/87:de:vo

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4. Add the following protective clothing statement to the Directions for Use section:

PROTECTIVE CLOTHING

When mixing/loading wear mid forearm to elbow length chemical resistant gloves, long-sleeve shirt, and long pants. During the application wear long-sleeve shirt and long pants. Applicator must also wear a wide-brimmed chemical resistant hat while spraying up toward fruit and nut crops.

Any article of clothing worn while applying product must be cleaned before reusing. Clothing should be laundered separately from household articles. Clothing which has been drenched or has otherwise absorbed concentrated pesticide must be disposed of in a sanitary landfill, incinerated, or burned if allowed by State and local authorities.

Submit five (5) copies of your final printed labeling bef - you release the product for shipment.

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

Sincerely yours,

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

Enclosure

IMIDAN® 1-E

INSECTICIDE

An Emulsifiable Concentrate

ONLY FOR SALE TO, USE, AND STORAGE BY SERVICEPERSONS. For control of insects specified in the directions on deciduous shade trees, evergreens, ornamental flowering trees and shrubs and roses.

CONTAINS 1 POUND IMIDAN PER GALLONJAN2 01987

KEEP OUT OF REACH OF CHILDREN Francisco

WARNING

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· STATEMENT OF PRACTICAL TREATMENT

f 11 a Poison Center or a Physician Immediately: If a known exposure occurs o. is suspected, immediately start the procedures given below. Simultaneously contact a Poison Center, a physician, or the nearest hospital, or call collect, day or night:

(203) 226-6602 STAUFFER CHEMICAL COMPANY 0R

(800) 424-9300 PESTICIDE TEAM SAFETY NETWORK

Note: Advise the person contacted that the compound is a cholinesterase inhibitor. Describe the type and extent of exposure, the victim's symptoms, and follow the advice given.

Note to Medical Personnel: Atropine by injection is antidotal for cholinesterase inhibition. Pralidoxime chloride (Protopam, 2-PAM) is also antidotal when administered early and in conjunction with atropine.

In swallowed, immediately give several glasses of water but <u>do not</u> induce vomiting. If vomiting ocurs, give fluids again. Have a physician determine if condition of patient will pormit induction of vomiting or evacuation of stomach. Do not give anything by mouth to an unconscious or convulsing person.

If inhaled, remove to fresh air. If breathing is difficult, oxygen may be given with a physician's advice. If not breathing, clear victim's airway and start mouth-to-mouth artificial respiration. Get medical attention.

If in eyes, immediately flush eyes gently with large amounts of running water. for at least 15 minutes. Hold eyelids apart during the flushing to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.

If on skin, flush affected areas with plenty of water for several minutes. Remove and clean contaminated clothing and shoes. Seek medical attention if irritation occurs.

BEST AVAILABLE COPY

SEE LEFT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 476-2167 EPA F.st. 476__GAL. NET___L __RS-860404

This product is sold only for uses stated on its label. No express or implied license is granted to use or sell this product under any patent in any country except as specified:
Country: United States

Made in U.S.A. by STAUFFER CHEMICAL COMPANY WESTPORT, CT. 06881-0850 NEW EMPTY PAGE

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING:

- · Causes eye irritation.
- · May cause skin irritation.
- · May be harmful if swallowed or inhaled. Avoid breathing spray mist.
- · Do not get in eyes, on skin or on clothing.
- In case of contact, flush eyes with plenty of water for at least 15 minutes. For skin contact, flush with plenty of water. Wash contaminated clothing with soap and hot water before re-use. Wash thoroughly after handling and before eating or smoking.
- · Do not contaminate food or feed.

ENVIRONMENTAL HAZARDS

- This product is toxic to fish, birds, and other wildlife. Birds and other wildlife feeding in treated areas may be killed. Do not apply directly to water. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes.
- This pesticide is highly toxic to bees exposed to direct treatment or to residues remaining on the treated area. Do not apply when bees are actively visiting the crop, cover crop, or weeds blooming in the treatment area. Applications should be timed to provide the maximum possible interval between treatment and the next period of bee activity.

PHYSICAL HAZARDS

Combustible. Do not use, store, pour, or spill near heat: or open's
flame. Keep container closed when not in use.

STORAGE AND DISPOSAL

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

STORAGE: Store only in original container. Protect from temperatures below 25°F. Product crystallizes at lower temperatures. Warm or store at higher temperatures and mix to redissolve crystals and assure uniformity before use. Do not store near sources of heat or open flame.

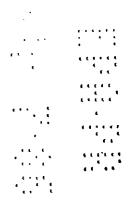
PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: 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.

SPIL. OR LEAK: Small spills can be handled routinely. Use adequate ventilation and wear an air-supplied respirator to prevent inhalation. Wear suitable protective clothing to prevent skin and eye contact. Use the following procedures:

- 1. Spread a suitable absorbent such as clay, sawdust or kitty litter on the spiiled material.
- 2. Place sweepings in an appropriate chemical waste container.
- 3. Generously cover the contaminated areas with a common household detergent. Using a stiff brush and small amounts of water, work the detergent into the spill material forming a slurry. Do not splatter on one's self or bystanders and completely avoid skin or eye contact with this material. Brush the slurry into cracks and crevices and allow to stand for 2-3 minutes.
- 4. Spread absorbents on the slurried liquid and shovel the absorbed material into the container.
- 5. Repeat if necessary.
- 6. Flush the area with water while observing proper environmental considerations.
- 7. Seal container and dispose of in approved pesticide landfill.

Large spills should be handled according to a predetermined plan. For assistance in developing a plan, contact the Agricultural Chemical Division, Stauffer Chemical Company, Westport, CT 06881-0850.



PRODUCT INFORMATION

- · MIX WELL BEFORE USING.
- IMIDAN 1-E is an emulsifiable liquid for use in water for spray applications. Combinations with other insecticides and fungicides have not been fully tested at this time. It is not compatible with alkaline materials such as lime or bordeaux mixtures.
- Read all label directions before using. Apply this product only as specified on this label.
- · Keep children and pets away from immediate area while spraying.
- · Do not apply during periods of abnormally high humidity.
- · Do not overdose.

INSECTS CONTROLLED BY IMIDAN 1-E ARE THE FOLLOWING:

Birch Leafminer Leaf Tiers Maple Aphid Elm Leaf Beetle Mealy Bug Elm Spanworm European Red Mite Mimosa Webworm Fall Cankerworm Pine Bark Aphid Fall Webworm Rose Aphid Forest Tent Caterpillar Spring Cankerworm Fruit Tree Leaf Roller Two-Spotted Mite Green Apple Aphid Willow Leaf Beetle Gypsy Moth Woolly Apple Aphid Woolly Beech Aphid Japanese Beetle

RECOMMENDATIONS:

IMIDAN 1-E may be used on the following plant species:

Shade Trees		
Ash	Elm	Maple
Beech	Hickory	0 a k
Birch	Locust	Willow

Flowering Trees			
Crape Myrtle	Jasmine		
Dogwood	Lilac		
Euonymus	Magnolia		
Forsythia	Privet		
Hawthorne	(DO NOT USE ON	WASHINGTON	HAWTHCRNE)

Evergreens	
Arborvitae	Juniper
Azalea	Mountain Laurel
Boxwood	Pine
Cotoneaster	Pyracatha
Fir	Rhododendron
Hemlock	Spruce
Kolly	Yew

DIRECTIONS FOR USE

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

- · MIX WELL BEFORE USING.
- As a general foliar spray on shade trees and ornamentals, use
 1 to 3 quarts per 100 gallons of water in a hydraulic sprayer (2
 to 6 teaspoonsful per gallon) or 1 to 3 gallons per 50 gallons
 of water in a mist blower. Apply thoroughly to all plant surfaces
 when insects appear, repeat as necessary.

NOTE: The dilutions given for mist blowers are based on 8 times the concentration used for hydraulic sprayers. Adjustment should be made in accordance with the manufactuer's directions for the capacity of each mist blower.

- Pour the recommended amount of IMIDAN 1-E into the spray tank during the filling operations.
- Improved wettability can be achieved with the addition of a spreader sticker.

DOSAGE RATES

INSECTS	HYDRAULIC SPRAYER DILUTIONS	
Green Apple Aphid Maple Aphid Rose Aphid Woolly Apple Aphid Woolly Beech Aphid	Use 1 to 2 quarts/100 gallons.	
Elm Leaf Beetle Elm Spanworm Fall Cankerworm Fall Webworm Forest Tent Caterpillar	Use 2 to 3 quarts/100 gallons. Use 2 quarts for early instars.	
Gypsy Moth Japanese Beetle Leaf Tiers Spring Cankerworm Willow Leaf Beetle	•••	(ctt2t (t) (ctt) (t) (t)
Birch Leafminer European Red Mite Mealy Bug Pine Bark Aphid	Use 2 quarts/100 gallons.	

Fruit Tree Leafroller Mimosa Webworm ~wo-Spotted Mite Use 3 quarts/100 gallons.

NOTICE - READ CAREFULLY

CONDITIONS OF SALE: Stauffer (and seller) offer(s) this product for sale subject to, and buyer and all users are deemed to have accepted, the following conditions of sale and warranty which may only be varied by written agreement of a duly authorized representative of Stauffer.

WARRANTY LIMITATION: Stauffer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the directions for use on the label subject to the inherent risks referred to below. Stauffer makes no other express warranties: THERE IS NO IMPLIED WARRANTY OF MERCHANTABILITY and there are no warranties which extend beyond the description on the label hereof.

INHERENT RISKS: The directions for use of this product are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks associated with use. Buyer assumes all risks associated with use or application of this product contrary to label instructions or resulting from extraordinary weather conditions.

LIMITATION OF LIABILITY: In no case shall Stauffer be liable for special, indirect or consequential damages resulting from the use or handling of this product and no claim of any kind shall be greater in amount than the purchase price of the product in respect of which such damages are claimed.