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Systems Integration Group, Inc.

PM- 04

769-690

6/18/99

Page 139



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

JUN 18 1999

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Stacy A. Schmidt
SureCo
7501 Harps Mill Road
Raleigh, NC 27615-5422

Subject: DFC-4 Formulators Concentrate
EPA Reg. # 769-690
label amendment submitted 7/10/98
accepted with comments

Dear Ms. Schmidt:

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.

Topic	Action required
Ingredients	Add the following text following the ingredients list: "Contains 4 pounds of chlorpyrifos per gallon."
First Aid	Replace current "If swallowed" text 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."

Topic	Action required
Note to physician	<p>1) Remove "Note to Physician" which appears before the "First Aid" section. A similar note already appears in the correct location immediately following the first aid text.</p> <p>2) Add the following to the current note to physician:</p> <p style="padding-left: 40px;">"Aromatic petroleum solvent may pose an aspiration pneumonia hazard."</p>
Environmental Hazards	<p>Replace current text in this section with the following:</p> <p style="padding-left: 40px;"><i>"This pesticide is toxic to birds and wildlife, and extremely toxic to fish and aquatic organisms. 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."</i></p>

Topic	Action required
Directions for Use - INTO	<p>Add the following text using the format given. As you are using a Formulator's Exemption for data compensation, you may list any uses which are on the current label of the pesticide product from which you formulate your product.</p> <p><i>Note: the following text assumes you want only the uses described in your current text in this section. From a data compensation point of view, you may delete some of these sites or, if additional sites are desired, add sites on the current label of the product from which your formulate (copy enclosed). However, <u>if you make any changes to the following text you must submit a label amendment for approval.</u></i></p> <p>"This product may be used ONLY for formulation into an insecticide for the following uses:</p> <p>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, sod farms, and commercial turfgrass areas.</p> <p>Ornamentals (Outdoor and Nursery)(Terrestrial Nonfood Crop)(Greenhouse Nonfood 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.</p> <p>Tree and Forest Pests (Forestry)(Domestic Outdoor): Nurseries, plantations, felled trees, shade and flowering trees, Christmas tree plantations, cut stumps.</p>

Topic	Action required
Directions for Use - INTO (continued)	(continued from above) "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."

Topic	Action required
Directions for Use - NOT INTO	<p>Chlorpyrifos technical and manufacturing use products must include a list of certain uses for which the product may <u>not</u> be used. This is unusual for a pesticide label but was done as part of the risk reduction agreement with chlorpyrifos registrants in order to avoid any ambiguity regarding uses. Following the section listing sites for which the product may be used (see above) <i>add the following text. This text may not be edited in any way and must appear in its entirety.</i></p> <p>"This product may NOT be used for formulation into manufacturing-use or end-use products for the following uses:</p> <p>Pest Control Indoors (Indoor): Indoor broadcast use; total release foggers for indoor residential and nonresidential (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.</p> <p>Pest and Domestic Animals (indoor): Animal dips, sprays, shampoos, dusts.</p> <p>Aquatic Uses (Aquatic Food Crop)(Aquatic Non-Food): Any aquatic use, including mosquito larvicide.</p> <p>Pest Control Indoors or Outdoors (Domestic Indoor or Outdoor): Paint additives, application in sewer manholes.</p> <p>All manufacturing-use products produced from this product must bear a statement prohibiting formulation of such products for the uses identified above."</p>

Topic	Action required
Storage and Disposal - container disposal	Replace the current container disposal text with the following: "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."

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

7 2 9
ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUN 18 1989

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
769-690

**DFC-4
FORMULATORS CONCENTRATE
FOR MANUFACTURING USE ONLY**

INDOOR USE IS LIMITED TO SPOT TREATMENT AND/OR CRACK AND CREVICE
TREATMENT ONLY.

ACTIVE INGREDIENTS:

Chlorpyrifos (O,O-diethyl 0(3,5,6-trichloro-2-pyridyl) phosphorothioate)	44.8%
OTHER*	55.2%
TOTAL:	100.0%

*Contains petroleum distillates

**KEEP OUT OF REACH OF CHILDREN
WARNING**

EPA Reg. No. 769-690

EPA Est. No. 769-GA-1

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

May be fatal if swallowed. May be injurious to the eyes and skin. Do not get in eyes or on skin or clothing.

Do not breathe vapors. Wash thoroughly after handling. Wash contaminated clothing before reuse. Keep away from food, feed and water supplies.

Note to Physician: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote.

FIRST AID

This product is an organophosphate insecticide.

If Swallowed: 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. Get medical attention.

If Inhaled: Remove victim to fresh air. Get medical attention.

If On Skin: In case of contact, wash effected area with soap and water.

If In Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists.

Note To Physician: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine, only by injection, is the preferable antidote.

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. Fish and crustaceans may be killed if their waters are contaminated with this product. Do not contaminate water by cleaning equipment. or 'disposal of wastes. For further guidance, contact the nearest EPA Regional Office.

PHYSICAL AND CHEMICAL HAZARDS

DO NOT USE, POUR, SPILL OR STORE NEAR HEAT OR OPEN Flame. Minimum Flash Point: 90° F.

DIRECTIONS FOR USE

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

Control numerous pests of households, turf and ornamental plants, area control of ticks and chiggers, ornamental outdoor and nursery plants, trees and forest pests of nurseries, plantations and felled trees, and as a dormant spray for trees and forest pests.

NOTE: Because of their properties and intended uses, insecticidal formulations containing DFC-4 may require precautionary labeling differing from that given. Formulators should develop their own and precautionary labeling based on the properties and intended uses of their own finished formulations, and in accordance with all pertinent laws and regulation.

STORAGE AND DISPOSAL

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

Storage: Avoid storage at high temperatures. Protect from moisture. Avoid contamination with water, acids or alkalies. Keep container closed. Store in original containers only. Separate pesticides to avoid cross-contamination of other pesticides, fertilizer, food feed. Keep container in locked storage areas.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticides, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

2

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.

IMPORTANT: Read these entire Directions and Conditions of Sale before using this product. **DISCLAIMER:** SureCo warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. SureCo makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. In no case shall SureCo be liable for consequential, special, or indirect damages resulting from the use, handling or application of this product.

NOTICE: Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with directions given herewith.

Manufactured By:
SureCo, Inc.
Fort Valley, GA 31030

per EPA letter 5/1/98