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16 NOV 1984

Mr. John Bergman
Velsicol Chemical Corp.
341 East Ohio Street
Chicago IL 60611

BEST AVAILABLE COPY

Dear Mr. Bergman:

Subject: Amendment - Update labeling
Child Resistant Packaging Certification
Chlordane 8 EC
EPA Registration No. 876-104
Your submissions dated September 24, 1984

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 of the label is enclosed for your records.

At the next label printing we recommend the following revisions:

1. In the "If Swallowed" advice delete "Repeat until vomit fluid is clear" since this only increases the chance of the aspiration pneumonia complication.
2. Delete "or spray mist" from the Hazards to Humans section since this product does not have spray mist application directions.
3. The Hazards to Humans section statement "In case of contact, wash skin with soap and water or flush eyes with water for 15 minutes and get medical attention." could be interpreted to mean that if material accidentally gets on skin then the user should seek medical attention. Is this your intention? Such a recommendation is not presented in the "If on Skin" advice found in the Statement of Practical Treatment. If that recommendation is only pertinent to contact with eyes, it would be better to separate the skin and eye advice into two sentences.
4. Revise "Keep out of lakes, streams, or ponds" to "Do not apply directly to water or wetlands" in the Environmental Hazards text.

Sincerely yours,

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

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Chlordane 8EC

EMULSIFIABLE CONCENTRATE

ACTIVE INGREDIENTS:	
Technical Chlordane	72.0%
Petroleum Distillate	21.0%
INERT INGREDIENTS	
TOTAL	100.0%

Equivalent to 63.2% Octachloro-4,7-methanotetrahydroindane and 28.8% related compounds. Contains 8.0 lbs. actual Chlordane per gallon.

KEEP OUT OF REACH OF CHILDREN

WARNING

STATEMENT OF PRACTICAL TREATMENT

If swallowed—Call a physician or Poison Control Center immediately. Gastric lavage is indicated if the material was taken internally. **DO NOT INDUCE VOMITING** unless other treatment is not available. Vomiting may cause aspiration pneumonia. If it is necessary to induce vomiting, give victim one or two glasses of water and insert finger in back of throat. Repeat until vomit turns clear. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin—Remove contaminated clothing and wash affected areas with soap and water. If in eyes—Flush with plenty of water for 15 minutes. Contact a physician immediately if inhaled—Remove victim to fresh air and apply artificial respiration if indicated.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

E.P.A. Reg. No. 876-104-AA
E.P.A. Est. No. 876-TN-1

NET CONTENTS:
1 GALLON



ACCEPTED WITH COMMENTS
EPA Letter Dated:
NOV 16 1984

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for registration purposes.

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BEC



SICOL

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if swallowed. Do not breathe vapor or spray mist. Do not get in eyes, on skin, or on clothing. Wear goggles, face shield or safety glasses. In case of contact, wash skin with soap and water or flush eyes with water for 15 minutes and get medical attention. See front panel for complete Statement of Practical Treatment. Avoid contamination of feed and foodstuffs. Keep out of the reach of children.

A committee of the National Academy of Sciences has stated that

"There are no adequate data to show that these compounds are carcinogenic in humans, but because of their carcinogenicity in certain mouse strains and the extensive similarity of the carcinogenic action of chemicals in animals and in humans, the committee concluded that chlordane, heptachlor, and/or their metabolites may be carcinogenic in humans."

Environmental Hazards

This product is toxic to fish, birds and other wildlife. Keep out of lakes, streams, or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

Physical or Chemical Hazards

DO NOT USE, POUR, SPILL OR STORE NEAR HEAT OR OPEN FLAME

It is a violation against any pest control Termite control Use a 1% water emulsion First remove concrete dig inches deep extend from BELOW THE Apply the emulsion for the back-fill buildings CO TION IN A CR For raised po foundation, a cracks and e: The objective contain voids professional c which require inaccessible Agricultural C Avoid contami

Do not allow this material be purchased user of this Do not treat Refer to For areas from Soil in the saturation c grade lower Pressure. S stand undls Be careful

PROHIBIT STORAGE
Avoid cross contamination PESTICIDE pesticide a these wast Environmental for guidance **CONTAINER** and disposal

NOTICE: Read this It is critical that this cable or may give remedy of the damages resulting Except to the personal liability or from any this in violation of label year of discovery as first occurs. **THERE**

VELSICOL
CHEMICAL CORPORATION
241 E. OHIO ST. CHICAGO, IL 60611

DIRECTIONS FOR USE

It is a violation of Federal law to use the product in a manner inconsistent with its labeling. This product may not be used against any pests not named on the label.

Structures which include slab floors or slabs with heat ducts or radiant heat pipes should be treated by a commercial pest control operator.

Termite control in existing structures with basements or crawl spaces.

Use a 1% water emulsion for subterranean termites. Mix 1 gallon of Chlordane BEC to 95 gallons of water to produce a 1% water emulsion.

First remove all wood debris and wood forms. Around piers, pipes, chimney bases and along foundations of poured concrete dig a trench 6 inches wide and 4 inches deep. Along brick and block foundations dig the trench about 12 inches deep. If footing is more than 12 inches deep, make holes with a crowbar, pipe or a rod about one foot apart that extend from the trench bottom to the top of the footing. Make holes closer in hard-packed clay soils. NEVER DIG BELOW THE TOP OF THE FOOTING.

Apply the emulsion in the trench at a rate of 4 gallons per 10 linear feet per foot of depth from grade to the top of the footing. For example, if the foundation extends 3 feet below grade, use 12 gallons per 10 linear feet. Apply half of this to the back-fill as it is being replaced into the trench. Likewise, treat along the inside of foundations of crawl-space buildings. Cover treated soil with a thin layer of untreated soil. DO NOT MAKE AN OVERALL BROADCAST APPLICATION IN A CRAWL SPACE. DO NOT APPLY TO SOIL BENEATH A PLENUM AIR SPACE.

For raised porches, terraces, and entrance slabs, drill holes through the slab at one foot intervals, 6 inches from the foundation, and pour one-half gallon of emulsion into each hole. Sub-slab treatment may also be necessary along cracks and expansion joints. Refill holes.

The objective is to establish a treated soil barrier which will prevent termite entry. Block, brick or stone foundations may contain voids through which termites may enter. For a complete treatment, these gaps in the barrier can be treated by a professional pest control operator. Unusual foundation construction of brick or other material also may contain voids which require treatment to complete the barrier. Treatment may also be necessary in other critical areas, particularly inaccessible areas, pipe and conduit entrances, basements or slab-type construction. For advice, contact the Agricultural Cooperative Extension Service or consult a commercial pest control service.

Avoid contamination of public and private water supplies by following these precautions:

Do not allow a hose or any type of faucet extension to reach into the termite chemical emulsion while filling or mixing this material with water. Use anti-backflow or anti-siphonage equipment on all filling equipment. These devices can be purchased at hardware or plumbing supply stores. Use of anti-backflow equipment will help to ensure that the user of this toxic chemical will not contaminate domestic water supplies.

Do not treat soil beneath structures that contain cisterns or wells.

Refer to Federal (Federal Housing Administration), state, and local specifications for safe distances of treatment areas from wells.

Soil in the vicinity of wells, cisterns or ponds should not be treated if it is water saturated, subject to excessive saturation due to an accumulation of water, or if the soil to be treated around the perimeter of the structure is at a grade lower than surrounding yard or property area. If this is the situation treat as follows: Do Not Apply Under Pressure. Soil should be removed to an area safe from well or domestic water contamination, treated, allowed to stand undisturbed for two to four hours then returned to the trench which has been lined with 4 mil plastic sheeting. Be careful not to puncture the plastic sheeting when returning soil to the trench.

STORAGE AND DISPOSAL

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

STORAGE: Store in original container in a well ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained and absorbed with clay granules, sawdust or equivalent material and disposed of as excess pesticide. Wash area of spill with detergent and water.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Triple rinse pesticide from container and use rinsate in pesticide application. Improper disposal of excess pesticide, 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: After triple rinsing (or equivalent), offer for recycling or reconditioning, or recycle and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

LIMITED WARRANTY AND LIABILITY

NOTICE: Read this Limited Warranty and Liability before buying or using this product. If the terms are not acceptable, return it at once unopened. It is critical that this product be used and mixed only as specified on the label. The laws of a State may make some or all of this paragraph inapplicable or may give you rights in addition to your rights hereunder. Except to the extent prohibited by applicable law, the exclusive remedy of the user or buyer and the limit of liability of this Company or any other Seller for any and all losses, personal injuries or damages resulting from the use of this product, shall be the purchase price paid by the user or buyer for the quantity of product involved. Except to the extent prohibited by State law, there is no warranty and this Company and other Sellers disclaim all liability for losses, personal injury or damages, (i) arising from any use of this product in a manner or for a purpose not recommended in its label directions or from mixing this product before use with any substance except as recommended by the product's label, (ii) arising from handling or storage in violation of label instructions, (iii) for all indirect, special or consequential damages, (iv) when not reported to this Company within one year of discovery and (v) arising from product not used within the label designated shelf life or four years from date of purchase, whichever first occurs. THERE ARE NO IMPLIED WARRANTIES AND NO WARRANTIES OF MERCHANTABILITY OR FITNESS.