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30 NOV 1984

Mr. John Bergman
Valsicol Chemical Corp.
341 East Ohio Street
Chicago, IL 60511

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Dear Mr. Bergman:

Subject: Amendments - Update labeling
Chlordane 8EC for Repackaging/Professional
EPA Registration No. 876-303
Chlordane 8EC for Repackaging/Non-Professional
EPA Registration No. 876-304
Your submissions dated September 6, 1984

The labels referred to above, submitted in connection with registrations under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable provided the following revisions are made prior to release for shipment under the amended labeling:

1. Revise the "If Swallowed" advice by deleting "Repeat until vomit fluid is clear" since this only increases the chance of the aspiration pneumonia complication. We recommend that you also delete this same phrase from the Gold Crest C-100 end use product (EPA Reg. No. 876-63) for the same reason.
2. Delete "or spray mist" from the Hazards to Humans section since this is not an end use product with spray mist uses.
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.
4. Revise the respirator advice to reflect the current names of the regulating agencies involved: "... and a pesticide respirator jointly approved by the Mine Safety and Health Administration (MSHA) and by the National Institute for Occupational Safety and Health (NIOSH) for protection against chlordane".

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5. Revise the Environmental Hazards text to read as follows:

This product is toxic to fish, birds, and other wildlife. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

6. Add the following to the second paragraph of the Directions for Use:

"Repackagers using this product are responsible for obtaining EPA registration for their products."

Submit five (5) copies of the finished labels bearing the above revisions prior to release for shipment under the amended labeling. A stamped copy of the labeling for each of the subject products is enclosed for your records.

Please note that it is not necessary to include a Conditional Registration Agreement form when submitting such label update amendments.

Sincerely yours,

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



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Chlordane 8EC

EMULSIFIABLE CONCENTRATE
FOR REPACKAGING OF AN INSECTICIDE FOR NON-PROFESSIONAL TERMITE CONTROL ONLY

ACTIVE INGREDIENTS:

Technical Chlordane*	72.0%
Petroleum Distillate	21.0%

INERT INGREDIENTS 7.0%

TOTAL 100.0%

*Equivalent to 43.2% 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 recently. 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 fluid is 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. Consult a physician immediately if advised. Remove victim to fresh air and apply artificial respiration if needed.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS



E.P.A. Reg. No. 876-304-AA
E.P.A. Est. No.

NET CONTENTS:
55 GALLONS

ACCEPTED
WITH RESERVATIONS
EPA Letter Dated:



NOV 30 1984

Under the Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. 136-136c, 136d, 136e, 136f, 136g, 136h, 136i, 136j, 136k, 136l, 136m, 136n, 136o, 136p, 136q, 136r, 136s, 136t, 136u, 136v, 136w, 136x, 136y, 136z, 136aa, 136ab, 136ac, 136ad, 136ae, 136af, 136ag, 136ah, 136ai, 136aj, 136ak, 136al, 136am, 136an, 136ao, 136ap, 136aq, 136ar, 136as, 136at, 136au, 136av, 136aw, 136ax, 136ay, 136az, 136ba, 136bb, 136bc, 136bd, 136be, 136bf, 136bg, 136bh, 136bi, 136bj, 136bk, 136bl, 136bm, 136bn, 136bo, 136bp, 136bq, 136br, 136bs, 136bt, 136bu, 136bv, 136bw, 136bx, 136by, 136bz, 136ca, 136cb, 136cc, 136cd, 136ce, 136cf, 136cg, 136ch, 136ci, 136cj, 136ck, 136cl, 136cm, 136cn, 136co, 136cp, 136cq, 136cr, 136cs, 136ct, 136cu, 136cv, 136cw, 136cx, 136cy, 136cz, 136da, 136db, 136dc, 136dd, 136de, 136df, 136dg, 136dh, 136di, 136dj, 136dk, 136dl, 136dm, 136dn, 136do, 136dp, 136dq, 136dr, 136ds, 136dt, 136du, 136dv, 136dw, 136dx, 136dy, 136dz, 136ea, 136eb, 136ec, 136ed, 136ee, 136ef, 136eg, 136eh, 136ei, 136ej, 136ek, 136el, 136em, 136en, 136eo, 136ep, 136eq, 136er, 136es, 136et, 136eu, 136ev, 136ew, 136ex, 136ey, 136ez, 136fa, 136fb, 136fc, 136fd, 136fe, 136ff, 136fg, 136fh, 136fi, 136fj, 136fk, 136fl, 136fm, 136fn, 136fo, 136fp, 136fq, 136fr, 136fs, 136ft, 136fu, 136fv, 136fw, 136fx, 136fy, 136fz, 136ga, 136gb, 136gc, 136gd, 136ge, 136gf, 136gg, 136gh, 136gi, 136gj, 136gk, 136gl, 136gm, 136gn, 136go, 136gp, 136gq, 136gr, 136gs, 136gt, 136gu, 136gv, 136gw, 136gx, 136gy, 136gz, 136ha, 136hb, 136hc, 136hd, 136he, 136hf, 136hg, 136hh, 136hi, 136hj, 136hk, 136hl, 136hm, 136hn, 136ho, 136hp, 136hq, 136hr, 136hs, 136ht, 136hu, 136hv, 136hw, 136hx, 136hy, 136hz, 136ia, 136ib, 136ic, 136id, 136ie, 136if, 136ig, 136ih, 136ii, 136ij, 136ik, 136il, 136im, 136in, 136io, 136ip, 136iq, 136ir, 136is, 136it, 136iu, 136iv, 136iw, 136ix, 136iy, 136iz, 136ja, 136jb, 136jc, 136jd, 136je, 136jf, 136jg, 136jh, 136ji, 136jj, 136jk, 136jl, 136jm, 136jn, 136jo, 136jp, 136jq, 136jr, 136js, 136jt, 136ju, 136jv, 136jw, 136jx, 136jy, 136jz, 136ka, 136kb, 136kc, 136kd, 136ke, 136kf, 136kg, 136kh, 136ki, 136kj, 136kk, 136kl, 136km, 136kn, 136ko, 136kp, 136kq, 136kr, 136ks, 136kt, 136ku, 136kv, 136kw, 136kx, 136ky, 136kz, 136la, 136lb, 136lc, 136ld, 136le, 136lf, 136lg, 136lh, 136li, 136lj, 136lk, 136ll, 136lm, 136ln, 136lo, 136lp, 136lq, 136lr, 136ls, 136lt, 136lu, 136lv, 136lw, 136lx, 136ly, 136lz, 136ma, 136mb, 136mc, 136md, 136me, 136mf, 136mg, 136mh, 136mi, 136mj, 136mk, 136ml, 136mm, 136mn, 136mo, 136mp, 136mq, 136mr, 136ms, 136mt, 136mu, 136mv, 136mw, 136mx, 136my, 136mz, 136na, 136nb, 136nc, 136nd, 136ne, 136nf, 136ng, 136nh, 136ni, 136nj, 136nk, 136nl, 136nm, 136nn, 136no, 136np, 136nq, 136nr, 136ns, 136nt, 136nu, 136nv, 136nw, 136nx, 136ny, 136nz, 136oa, 136ob, 136oc, 136od, 136oe, 136of, 136og, 136oh, 136oi, 136oj, 136ok, 136ol, 136om, 136on, 136oo, 136op, 136oq, 136or, 136os, 136ot, 136ou, 136ov, 136ow, 136ox, 136oy, 136oz, 136pa, 136pb, 136pc, 136pd, 136pe, 136pf, 136pg, 136ph, 136pi, 136pj, 136pk, 136pl, 136pm, 136pn, 136po, 136pp, 136pq, 136pr, 136ps, 136pt, 136pu, 136pv, 136pw, 136px, 136py, 136pz, 136qa, 136qb, 136qc, 136qd, 136qe, 136qf, 136qg, 136qh, 136qi, 136qj, 136qk, 136ql, 136qm, 136qn, 136qo, 136qp, 136qq, 136qr, 136qs, 136qt, 136qu, 136qv, 136qw, 136qx, 136qy, 136qz, 136ra, 136rb, 136rc, 136rd, 136re, 136rf, 136rg, 136rh, 136ri, 136rj, 136rk, 136rl, 136rm, 136rn, 136ro, 136rp, 136rq, 136rr, 136rs, 136rt, 136ru, 136rv, 136rw, 136rx, 136ry, 136rz, 136sa, 136sb, 136sc, 136sd, 136se, 136sf, 136sg, 136sh, 136si, 136sj, 136sk, 136sl, 136sm, 136sn, 136so, 136sp, 136sq, 136sr, 136ss, 136st, 136su, 136sv, 136sw, 136sx, 136sy, 136sz, 136ta, 136tb, 136tc, 136td, 136te, 136tf, 136tg, 136th, 136ti, 136tj, 136tk, 136tl, 136tm, 136tn, 136to, 136tp, 136tq, 136tr, 136ts, 136tt, 136tu, 136tv, 136tw, 136tx, 136ty, 136tz, 136ua, 136ub, 136uc, 136ud, 136ue, 136uf, 136ug, 136uh, 136ui, 136uj, 136uk, 136ul, 136um, 136un, 136uo, 136up, 136uq, 136ur, 136us, 136ut, 136uu, 136uv, 136uw, 136ux, 136uy, 136uz, 136va, 136vb, 136vc, 136vd, 136ve, 136vf, 136vg, 136vh, 136vi, 136vj, 136vk, 136vl, 136vm, 136vn, 136vo, 136vp, 136vq, 136vr, 136vs, 136vt, 136vu, 136vv, 136vw, 136vx, 136vy, 136vz, 136wa, 136wb, 136wc, 136wd, 136we, 136wf, 136wg, 136wh, 136wi, 136wj, 136wk, 136wl, 136wm, 136wn, 136wo, 136wp, 136wq, 136wr, 136ws, 136wt, 136wu, 136wv, 136ww, 136wx, 136wy, 136wz, 136xa, 136xb, 136xc, 136xd, 136xe, 136xf, 136xg, 136xh, 136xi, 136xj, 136xk, 136xl, 136xm, 136xn, 136xo, 136xp, 136xq, 136xr, 136xs, 136xt, 136xu, 136xv, 136xw, 136xx, 136xy, 136xz, 136ya, 136yb, 136yc, 136yd, 136ye, 136yf, 136yg, 136yh, 136yi, 136yj, 136yk, 136yl, 136ym, 136yn, 136yo, 136yp, 136yq, 136yr, 136ys, 136yt, 136yu, 136yv, 136yw, 136yx, 136yy, 136yz, 136za, 136zb, 136zc, 136zd, 136ze, 136zf, 136zg, 136zh, 136zi, 136zj, 136zk, 136zl, 136zm, 136zn, 136zo, 136zp, 136zq, 136zr, 136zs, 136zt, 136zu, 136zv, 136zw, 136zx, 136zy, 136zz

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**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 food-stuffs. Keep out of the reach of children.

Wash thoroughly with soap and water after handling and before eating or smoking. Clean clothing should be used daily. Wear clean synthetic rubber gloves and a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11.

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. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with a National Pollution Discharge Elimination System Permit. For guidance contact your regional office of the Environmental Protection Agency.

PHYSICAL OR CHEMICAL HAZARDS

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

DIRECTIONS FOR USE

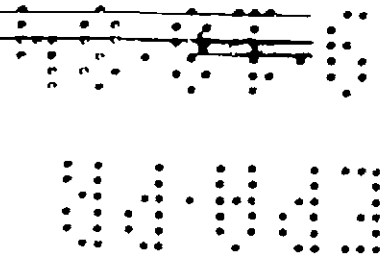
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This insecticide is for use only in the repackaging of products intended for use by the general public in the control of termites.

(Continued on Right Panel)

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NOTE: Any variation in your product's commercial labeling text from that of Velsicol's registrations may result in the need for additional data to support your registration.

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, saw dust 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 the 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 puncture 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 products 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.

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