

SEP 23 1997

Ms. Julie B. Schiekau Registration Specialist  
Mclaughlin Gormley King Company  
8810 Tenth Avenue North  
Minneapolis MN 55427-4372

Subject: Amendment Updating Product Labeling  
ESBIOL® 90% Concentrate  
EPA Registration Number 1021-1242  
Submission Dated July 11, 1997.

Dear Ms. Schiekau;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

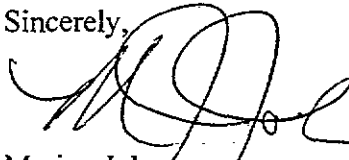
1. The precautionary statement should be modified to state " May be fatal if swallowed or absorbed through the skin. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Do not get in eyes, on skin, or on clothing. Wear protective clothing and rubber gloves. Remove contaminated clothing and wash clothing before reuse. Harmful if inhaled. Avoid breathing (vapor or spray mist). "
2. The "Statement of Practical Treatment" should be corrected as follows:
  - " IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.
  - IF ON SKIN: Wash with plenty of soap and water. Get medical attention.
  - IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.
  - IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists."
3. The "WARNING" signal word must appear in the precautionary labeling section of the label immediately after the subheading "Hazards to Humans and Domestic Animals".

244

4. The language "For Use on Non-Food (e.g., Non-commercial Ornamental Plants, and Forest Trees), Greenhouse Non-Food Crops (e.g., Non-Commercial Ornamental Plants), Domestic Outdoor (Domestic Dwellings and Outdoor) and Indoor Domestic (Food and Non-Food Areas), commercial, and Industrial Uses." should be removed since this product is intended for manufacturing use only, and adequate data has not been submitted to the Agency by MGK supporting these use sites for ESBIOL® 90% Concentrate.
  
5. The active ingredient description  
    "\* d-trans-chrysanthemum monocarboxylic acid ester of d-allyl-4-hydroxy-3-methyl-2-cyclopenten-1-one"  
should be corrected to identify the active ingredient as,  
    "\* d-trans-chrysanthemum monocarboxylic acid ester of d-allyl-4-hydroxy-3-methyl".  
This specific active ingredient identifier is required as part of the Registration Standard issued by the Agency on March 24, 1988 (EPA document # 5409/RS-88-063).
  
6. The active ingredient footnote "\* S-bioallethrin from ESBIOL®, Roussel-Uciaf, Paris, France ESBIOL®- Registered trademark of Roussel-Uciaf; Paris, France" should be revisited for accuracy by MGK. Agency records indicate that MGK's source supplier is now a part of AgrEvo Environmental Health.
  
7. The Agency revisited MGK's last Confidential Statement of Formula (dated 3/15/90). One of the registered sources listed on the CSF was canceled on 09/30/91. As identified in item #6 above the supplier name and address may change. The certified limits should also be accurately reflected as outlined in PR Notice 91-02.

Within 60 days, a revised CSF should be submitted to the Agency addressing the Agency's concerns identified in item #4 above. Five copies of the finished labeling must be submitted prior to releasing the product for shipment. If you have any questions, please contact Richard J. Gebken @ (703) 305-6701.

Sincerely,



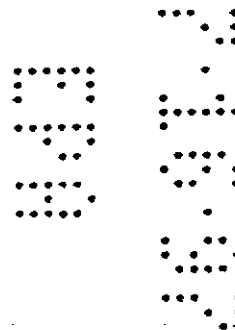
Marion Johnson  
Product Manager 10  
Insecticide Branch  
Registration Division (7505C)

ACCEPTED  
WITH COMMENTS  
by EPA Letter Dated

SEP 23 1997

Under the Federal Insecticide,  
Fungicide and Rodenticide Act  
of 1947, for the pesticide  
registered under EPA Reg. No.

1021-1242



**ACTIVE INGREDIENTS:**

\* d-trans-chrysanthemum monocarboxylic acid ester of d-allyl-4-hydroxy-3-methyl-2-cyclopenten-1-one

90.00%

**INERT INGREDIENTS**

10.00%

100.00%

\*S-bioallethrin from ESBIOLO, Roussel-Uclaf, Paris, France  
ESBIOLO - Registered trademark of Roussel-Uclaf; Paris, France

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Call a physician or Poison Control Center immediately.  
**IF IN EYES:** Flush with plenty of water. Get medical attention if irritation persists.  
**IF ON SKIN OR CLOTHING:** Remove contaminated clothing and wash before reuse. Wash skin with soap and warm water. Get medical attention if irritation persists.  
**IF INHALED:** Remove victim to fresh air. Apply artificial respiration if indicated.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

May be fatal if swallowed or absorbed through skin. Do not get in eyes or on skin. May cause skin irritation. Wash contaminated skin promptly with soap and warm water. Remove contaminated clothing and wash before reuse. Do not breathe vapors or spray mist. Avoid contamination of food and feedstuffs.

**ENVIRONMENTAL HAZARDS**

This pesticide is highly toxic to fish. 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 into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use 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 product is to be used with appropriate solvents, carriers, and for pressurized products, propellants, in the manufacture of insecticide sprays.

Please consult technical literature for specific manufacturing suggestions. Formulators who use this product may be responsible for providing data to support their own registrations with the appropriate regulatory agencies.

Mix well in drum before sampling and each use.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in a cool, dry place. Keep container closed.

**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) and offer for recycling or reconditioning, or dispose of in a sanitary landfill or by other procedures approved by State and Local authorities.

Net Contents \_\_\_\_\_

Manufactured by:  
Mc LAUGHLIN GORMLEY KING COMPANY  
8810 Tenth Avenue North  
Minneapolis, MN 55427

EPA Reg. No. 1021-1242

EPA Est. No. 1021-MN-2