

SEP 16 1991

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Fuller System, Inc.
226 Washington Street
Woburn, MA 01801

BEST AVAILABLE COPY

Gentlemen:

Subject: Sulfotep Technical Grade Organophosphorus Insecticide
EPA Registration No. 1327-39
Sulfotep Standard: Revised Labeling
Your letter of August 22, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable, subject to the comments listed below. Attached are copies of the relevant pages (19-22, 32-33) in the Standard.

1. On your Front Panel, change "For Manufacturing Purposes Only" to "An Insecticide for Formulating Use Only".
2. In your Ingredient Statement, align the words "Active" and "Inert" to the same left margin.
3. Add the following text immediately after "DIRECTIONS FOR USE" and your misuse statement:

Formulators using this product are responsible for obtaining EPA registration of their formulated product.

For formulation into end-use insecticide products intended only for greenhouse ornamental flowers: azaleas, carnations, chrysanthemums, geraniums, roses, and snapdragons.
4. In your "PRECAUTIONARY STATEMENTS", change "Poisonous" to "Fatal" and change "Dichlorvos (DDVP)" to "Sulfotep".
5. Under "ENVIRONMENTAL HAZARDS", revise first sentence to read:

This pesticide is toxic to fish.
6. Delete all references to a technical bulletin. It is currently not a part of your approved labeling. If you wish it to be part of your product labeling, submit five copies for our review.
7. Submit a revised Confidential Statement of Formula, copy attached. It will be reviewed with your product specific chemistry data, if required after review of your waiver request.

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give (5) copies of your final printed labeling before you
the product for shipment.

If these conditions are not complied with, the registration will be
subject to cancellation in accordance with FIFRA sec. 6(e). Your release
for shipment of the product bearing the amended labeling constitutes
acceptance of these conditions.

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

Sincerely,

Robert A. Forrest
Product Manager 14
Insecticide-Rodenticide Branch
Registration Division (H-7504C)

Enclosures: 1) Sulfotepp Standard (pp 19-22,32-33)
2) CSF

cc Richard King (H-7508C)

RAF:dbp:CM2:RM221:557-4407:9/13/91:Peacock Disk 56(9), 1327-39

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SULFOTEPP
TECHNICAL GRADE
ORGANOPHOSPHORUS INSECTICIDE
 FOR MANUFACTURING PURPOSES ONLY

ACTIVE INGREDIENTS:
 O,O,O,O TETRAETHYL-DITHIOPYROPHOSPHATE... 95%
INERT INGREDIENTS. 5%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

POISON



DANGER

PELIGRO



"PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que le entregue haya sido explicada ampliamente."

STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED — Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching back of throat with finger. Never induce vomiting or give anything by mouth to an unconscious or convulsing person.

IF INHALED — Remove victim to fresh air immediately. Apply artificial respiration if indicated. Get medical attention.

IF IN EYES — Flush eyes with plenty of water for at least 10 minutes. Get medical attention immediately.

IF ON SKIN — Remove contaminated clothing immediately and wash affected area with soap and water. Call a physician immediately. Wash clothing before re-use.

NOTE TO PHYSICIAN — WARNING SYMPTOMS: Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps.

TREATMENT. Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, atropine sulfate should be injected at 10-minute intervals, in doses of 1 to 2 milligrams, until complete atropinization has occurred.

Pralidoxime chloride (2-PAM chloride) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion in 250cc of saline over a 15 to 30 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection of a 5 percent solution in water over not less than 10 minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if weakness has not been relieved. For infants and children the dose of 2-PAM is 0.25 grams.

Morphine is an improper use.

Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may, without warning, cause protracted susceptibility to very small doses of any cholinesterase inhibitor. Allow no further exposure until cholinesterase regeneration has been obtained as determined by blood test.

SEE BACK/SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: POISONOUS IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN. REPEATED INHALATION MAY, WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE SUSCEPTIBILITY TO (DDVP) POISONING.

Do not swallow or get in eyes, on skin or on clothing. Do not contaminate food or feed products. Keep away from heat or open flame. Wear clean natural rubber gloves and waterproof protective clothing. Replace gloves frequently and destroy used gloves. We are jointly approved by the Mine Safety and Health Administration and the Institute for Occupational Safety and Health under the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act. Wash thoroughly with soap and water after handling and before eating.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not discharge this product directly into lakes, streams, ponds, estuaries, oceans, or other bodies of water. This product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previous approval from the local treatment plant authority. For guidance, contact your State or Federal Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with the directions on the label.

STORAGE & DISPOSAL

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

STORAGE — Store product in original container in a cool, dry, well-ventilated area, away from children.

PESTICIDE DISPOSAL — Pesticide wastes are acutely hazardous. Do not reuse or dispose of excess pesticide, spray mixture or rinsate in a manner inconsistent with the directions on the label. Do not mix or add to other pesticides. Do not discharge to sewer, stream, or other bodies of water. Contact your State or Federal Office of the Environmental Protection Agency for guidance.

CONTAINER DISPOSAL — Triple rinse (or equivalent). Then offer for recycling, or puncture and dispose of in a sanitary landfill, or by other means approved by State and local authorities, by burning, if burned, stay out of water.

CHEMICAL AND PHYSICAL PROPERTIES: Refer to Technical Bulletin for details. Formulators are responsible for providing data to support their registration.

DRUM HANDLING: Handle carefully to prevent damage and leakage. Do not set on end and under a ventilated hood. Unscrew bungs slowly.

NOTICE: This product conforms to its chemical description and is safe when used in accordance with directions on the label. The manufacturer is not responsible for the use of this product contrary to the label under abnormal conditions or under conditions not reasonably foreseeable by the manufacturer, and buyer assumes the risk of any such use.

EPA REG. NO. 1327-39

E P A EST. NO. 1327-MA-1

FULLER SYSTEM, Inc.
 226 Washington St.
 Woburn, MA 01801

NET CONTENTS 220 KG.

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with COMMENTS
in EPA Letter Dated:

SEP 16 1991

Under the Fungicide, Insecticide,
and Rodenticide Act
as amended, this pesticide
registered under FIFRA Reg. No.

1327-39

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