

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

Ms. Nik Ramswick
Universal Cooperatives, Inc.
7801 Metro Parkway
P.O. Box 460
Minneapolis, Minnesota
55440

Dear Ms. Ramswick:

Subject: Labeling Amendment/Updated Confidential Statement of

Formula

Methyl Parathion 4lb. EC EPA Reg. No. 1386-642

Submission was received at EPA on February 26, 1997

The labeling amendment and confidential statement of formula (CSF) referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, have been received and reviewed, and the following are the Agency's comments:

- 1. The CSF dated February 20, 1997 is acceptable.
- 2. All products distributed or sold under Methyl Parathion 4lb. EC (EPA Reg. No. 1386-642) must be packaged in labeled containers bearing a unique identification number that will remain on the label or container at all times.
- 3. The label you submitted is acceptable providing you make the following changes and/or address the following comments:
- a) On page one of your label amend the "RESTRICTED USE PESTICIDE" statement to:

"RESTRICTED USE PESTICIDE

DUE TO VERY HIGH ACUTE TOXICITY TO HUMANS AND BIRDS

For retail sale to and use only by certified applicator or persons under their direct supervision and only for those uses covered by the certified applicator's certification. Direct supervision for this product is defined as the certified applicator being physically present during application, mixing, loading, repair and cleaning of application equipment. Commercial certified applicators must also ensure that all persons involved in these activities are informed of the precautionary statements."

b) On page one of your label it appears that the nominal concentration should be 1.6% for Related compounds and that the INERT INGREDIENTS should be 56.2%.. Please check these calculations.

c) On page two of your label between the PRECAUTIONARY STATEMENTS section and PERSONAL PROTECTIVE EQUIPMENT section include the following:

"The National Pesticide Telecommunication Network is available for recommendations regarding poisoning management, emergency treatment, and other information regarding the toxicity of methyl parathion. The toll free number for the National Pesticide Telecommunication Network is 1-800-858-7378."

"If handled indoors provide mechanical exhaust ventilation. Keep all unprotected persons, children, livestock, and pets away from treated area or where there is danger of drift. Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help right away. See First Aid (Practical Treatment) section."

- d) On page 2 of your label in PPE section after the item
 "*For exposures outdoors, use a ...prefix %C-21C)." Include the following item "*Respirators must be cleaned and filters replaced according to instructions included with the respirators."
- e) On page 4 of your label please amend the ENVIRONMENTAL HAZARDS section with the following:

"This pesticide is highly toxic to aquatic invertebrates and wildlife. Birds in treated areas may be killed. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff and drift from target areas may be hazardous to aquatic organisms in adjacent aquatic sites. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters."

"This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area."

- f) Under the PHYSICAL OR CHEMICAL HAZARDS section delete "Spill or leak, keep all...with strong lye solution." This will be included in the STORAGE AND PESTICIDE DISPOSAL section discussed in part (h) of this letter.
- g) In the middle of page 5 within the text beginning with "ATTENTION..." change the sentence that begins with "Because this material...intend to be sprayed." to "Because this material is poisonous by skin contact, inhalation or swallowing, it must not be used in such a manner or under weather conditions that will permit drift of the spray onto areas not intended to be sprayed."

h) On page 5 delete "MIXING DIRECTIONS ... a uniform emulsion is formed." with the following:

DIRECTIONS FOR USE

REMOVAL OF PRODUCT FROM CONTAINER

This container is fitted with the MICRO MATIC "DV" liquid transfer valve system. To remove product, use the MICRO MATIC coupler attachment, which is available from the seller of this container. The directions below must be followed:

To Connect Coupler:

- 1. Attach pump hose to chemical pump.
- 2. Attach pump hose to coupler.
- 3. With coupler handle in disengaged position, insert coupler straight down into the drum valve, ensuring that the pins on the coupler align with the slots on the valve.
- 4. Turn coupler handle clockwise a quarter turn, until it locks into place.
- 5. Push down coupler handle to engage, ensuring that the lock bar clicks into place.

To Disconnect Coupler:

- 1. Press down on coupler and disconnect the lock bar. Allow coupler handle to raise to its disengaged position.
- 2. Turn coupler handle counter clockwise a quarter turn. Lift coupler straight up.

If you have any questions or need assistance, please call your Distributor or 1-800-548-6113.

"Add the concentrate to the spray tank while filling with water, and mix thoroughly either by means of a tank agitator or pump by-pass. For best results, thoroughly cover all surfaces to be treated with spray. Rates of application given below must not be exceeded. Never apply later than indicated to assure residue levels at harvest are below tolerances established by the Environmental Protection Agency."

"Consult the State Agricultural Extension Service or Experiment Station for specific recommendations regarding application, dosage and timing of spray. For application by ground equipment, add Methyl Parathion 4lb. EC concentrate in 3-6 gallons of water per acre. For application by aircraft, add the amount of Methyl Parathion 4lb. EC concentrate in 1-3 gallons of water per acre."

"Do not use in undiluted form."

"Do not apply this product through any type of irrigation system."

- I) On page 6 delete the first paragraph: "If ground equipment ...water per acre."
- j) Revise your STORAGE AND HANDLING and DISPOSAL section to the following:

STORAGE AND PESTICIDE DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Do not store under conditions which might adversely affect the container or its ability to function properly.

STORAGE: Do not store below a temperature of 0 degree F. Store in safe manner. Store in original container only. Keep container tightly closed when not in use.

PROTECTIVE EQUIPMENT AND CLOTHING: Personnel should use clothing and equipment listed under "PRECAUTIONARY STATEMENT" when handling container.

SPILLED MATERIAL: Block or dike to prevent spreading of spill. Cover with absorbent

material such as lime, clay or sawdust. Scoop and sweep into a disposable container. Wash area with strong lye solution, absorb and place into a disposable container.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your

Please make the above changes and submit five copies of your final label within 30 days.

If you require further guidance concerning the above instructions please contact Larry Fried, of my staff, at (703) 308-6742.

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

Sincerely,

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Tina E. Levine, Ph.D. Acting Product Manager (Team 19) Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

RESTRICTED USE PESTÍCIDE

DUE TO VERY HIGH ACUTE TOXICITY TO HUMANS AND BIRDS

For retail sale only to certified commercial aerial applicators or persons under their direct supervision. For use only by certified commercial aerial applicators. Direct supervision for this product is defined as the certified commercial aerial applicator being physically present during mixing, loading, repair and cleaning of application equipment. Certified commercial aerial applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

SPECIAL INSTRUCTIONS FOR RESTRICTED USE PESTICIDE RETAILERS: In addition to any other required records, restricted use pesticide retailers must record at the time of sale the unique container identification number on this label or container and the identity of the purchaser of the container.

METHYL PARATHION 4 LB. EMULSIFIABLE CONCENTRATE

For Control Of Boll Weevil, Cotton Aphid, Cotton Fleahopper, Thrips, Cotton Leafworm, Cotton Leaf Perforator, And Some Species Of Spider Mites On Cotton And Certain Insects Attacking Small Grains And Soybeans.



KEEP OUT OF REACH OF CHILDREN DANGER - PELIGRO - POISON - VENO



Si usted no entiende la etiqueta, busque a alquien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail).

See Additional Precautionary Statements On Back Panel

ACTIVE INGREDIENTS:

0,0-dimethyl O-p-nitrophenyl Phosphorothioate*	42.2%
Related Compounds	2.3%
INERT INGREDIENTS**	55.5%
Total	100.07

*Methyl Parathion. Contains 4 Lbs. Methyl Parathion per gallon.

**Contains Aromatic Petroleum Derivative Solvent.

ACCEPTED who COMBIENTS

Net Contents: 2 1/2 Gallons

in EPA Letter Dated

EPA Reg. No. 1386-642 EPA Est. No. 1386-0H-1

MAY 20 1997

the Federal Insecticide, and Rodentielde Act meicide. us amended, for the pesticide EPA Reg. registered under



·Universal Cooperatives,



in small amounts; spray mist may be fatal if



CAN KILL BY SKIN CONTACT This product can kill you it swallowed even. This product can kill you if touched by hands. This product can kill you if vapors or spray or spilled or splashed on skin, in eyes or on

clothing (liquid goes through clothes)

mist are breathed

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Poisonous if swallowed, inhaled or absorbed through skin. Rapidly absorbed through skin. Repeated exposure may, with out symptoms, be increasingly hazardous. Do not breathe vapors or spray mist. Do not get in eyes, on skin or on clothing.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category G on an EPA chemical resistance category selection chart.

Applicators and Other Handlers Must Wear:

- * Coveralls over long-sleeved shirt and long pants
- * Chemical-resistant gloves, such as barrier laminate or viton...
- * Chemical-resistant footwear plus socks
- * Protective eyewear
- * Chemical-resistant headgear for overhead exposure
- * Chemical-resistant apron when cleaning equipment, mixing, or loading
- * For exposures in enclosed areas, use a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- * For exposures outdoors, use a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls Statements: Human flaggers are strictly prohibited during aerial application. When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- *Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- *Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- *Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

STATEMENT OF PRACTICAL TREATMENT

ORGANOPHOSPHATE

Call a doctor (physician), clinic or hospital immediately. Explain that the victim has been exposed to methyl parathion and describe his condition. If doctor cannot come, take victim to clinic or hospital. Move patient immediately from the area where methyl parathion is present.

IF INHALED: Remove victim to fresh air. If not breathing, immediately give artificial respiration, preferably mouth-to-mouth, and maintain until doctor sees victim. If breathing is difficult, give oxygen.

IF IN EYES OR ON SKIN: Immediately flush with plenty of water for at least 15 minutes while removing contaminated personal clothing and shoes to avoid continued possible exposure to victim or persons in attendance.

IF SWALLOWED: Induce vomiting immediately by giving two glasses of water and by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Have victim lie down and keep quiet.

POISON SIGNS (Symptoms)

Methyl parathion is a very dangerous poison. It rapidly enters the body on contact with all skin surfaces and eyes. Clothing wet with this material must be removed immediately. Exposed persons must receive prompt medical treatment or they may die.

Some of the signs and symptoms of poisoning are headaches, nausea, vomiting, cramps, weakness, blurred vision, pin-point pupils, tightness in chest, labored breathing, nervousness, sweating, watering of eyes, drooling or frothing of mouth and nose, muscle spasms, and coma.

ATROPINE IS AN ANTIDOTE. CONSULT PHYSICIAN FOR EMERGENCY SUPPLY. CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED METHYL PARATHION POISONING.

If symptoms or signs of poisoning include blurred vision, abdominal cramps, and tightness in the chest, do not wait for a doctor but give two atropine tablets (each 1/100 grain of 0.65 milligrams) at once. (One tablet to children under five years of age.)

NOTE TO PHYSICIAN

ANTIDOTE: Administer atropine sulfate in large doses. TWO to FOUR mg. intravenously or intramuscularly as soon as cyanosis is overcome. Repeat at 5 to 10 minute intervals until signs of atropinization appear. 2-PAM chloride is a pharmacologic antidote and may be administered as an adjunct to, but not a substitute for, atropine which is a symptomatic and often life-saving antidote. DO NOT GIVE MORPHINE OR TRANQUILIZERS BECAUSE THESE ANTIDOTES MAY PRODUCE ADVERSE EFFECTS ACCENTUATING THE PHARMACOLOGIC EFFECT OF THIS PRODUCT. This product is a strong cholinesterase inhibitor affecting the central and peripheral nervous systems and producing cardiac and respiratory depression. At first sign of pulmonary edema, the patient should be given supplemental oxygen and treated symptomatically. Continued absorbtion of the poison may occur and fatal relapses have been reported after initial improvements. VERY CLOSE SUPERVISION OF THE PATIENT IS INDICATED FOR AT LEAST 48 HOURS.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, shrimp, crab, birds and other wildlife. Birds and other wildlife in treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where these are important resources. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

This product is highly toxic to bees exposed to direct treatment or residues on crops. Protective information may be obtained from your Cooperative Agricultural Extension Service.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use, pour, spill or store near heat or flame. In case of fire, use water spray, foam, dry chemical or CO². Spill or leak, keep all unprotected persons away. Cover with absorbent such as soda ash, lime, clay or sawdust. Sweep up and bury. Wash area thoroughly with strong lye solution.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this

AGRICULTURAL USE REQUIREMENTS "Continued"

label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours. Each 48-hour REI is increased to 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

*Coveralls over long-sleeved shirt and long pants

*Chemical-resistant gloves, such as barrier laminate or viton

*Chemical-resistant footwear plus socks

*Protective eyewear

*Chemical-resistant headgear for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

ATTENTION: To avoid excessive residues of methyl parathion on food or forage crops always observe the statements found under "DIRECTIONS FOR USE," limiting the time before harvest when methyl parathion may be applied. Because this material is poisonous by skin contact, inhalation or swallowing, it should not be used in such a manner or under weather conditions as will permit drift of the spray onto areas not intended to be sprayed. Do not apply or allow drift to areas occupied by unprotected humans or beneficial animals.

MIXING DIRECTIONS

Mix Methyl Parathion with water by agitation or by circulating the mixture through the spray pump and back into the tank. A proper mixture will have the appearance of a milky emulsion with no free oil on the surface. Agitate before use until a uniform emulsion is formed.

COTTON: For control of thrips, lygus bugs, cotton fleahopper and aphids, apply I/2 to 1 pint of MP 4 Lb. per acre. Make first application when infestation warrants and repeat at 4-5 day intervals as needed.

For control of bollweevil, cotton leafworm, garden webworm and some species of spider mites, apply 1 pint MP 4 Lb. per acre. Make first application when infestation warrants and repeat at 4-5 day intervals as needed.

For control of bollworm, tobacco budworm, and cotton leaf perforator, apply 2 pints MP 4 Lb. per acre. Repeat at 4-5 day intervals as needed.

If ground equipment is used apply recommended amount of MP. 4 Lb. in 3-6 gallons of water per acre. For airplane application, apply recommended amount of MP 4 Lb. in 1-3 gallons of water per acre.

Do not spray cotton within 7 days of hand picking.

Do not feed forage or gin trash to livestock or other beneficial animals.

SMALL GRAINS (Wheat, Oats, Rye, and Barley): For control of greenbug, apply 1/2 pint of MP 4 Lb. per acre. Do not apply within 15 days of harvest.

SOYBEANS: For control of bollworm, apply 2 pints MP 4 Lb. per acre. Do not apply within 20 days of harvest or feeding.

STORAGE AND DISPOSAL

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

STORAGE AND HANDLING

- 1. Handle container carefully so as to avoid damage and prevent leakage.
- 2. Do not use or store in or around the home.
- 3. Store container in a well ventillated place.
- 4. Empty container retains vapor and product residue. Observe all label safeguards until container is cleaned, reconditioned or destroyed.
- 5. Keep out of reach of children and domestic animals.

DISPOSAL

Wastes of this pesticide are acutely hazardous. Improper disposal of excess pesticide, spray mixtures, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of according to label use instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

RETURNABLE/REFILLABLE SEALED CONTAINER: Do not break seals or add any material to the container. Do not rinse container or empty any residue from container. This container must be returned intact after use to the point of purchase.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty, including any other express or implied warranty of Fitness or of Merchantability, and no agent of Seller is authorized to do so except in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.