

1812-293

3-26-1987

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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Ms. Dianne Savage
Griffin Corporation
P.O. Box 1847
Valdosta, GA 31603-1847

MAR 26 1987

Dear Ms. Savage:

Subject: Amendments - Updated Formulas/Revised Labeling/
New Product Name
Technical Copper Sulfate Pentahydrate
EPA Registration No. 1812-293
Kobasic
EPA Registration No. 1812-300
Copper Sulfate Pentahydrate Crystals
EPA Registration No. 1812-304
Blue Viking Copper Sulfate Star Shine Crystals
EPA Registration No. 1812-313
Blue Viking Copper Sulfate Star Flow Powder
EPA Registration No. 1812-314
Blue Viking Copper Sulfate Star Flow Solution
EPA Registration No. 1812-319
Your Submissions Dated February 9 and 16, 1987

The updated basic formulas for EPA Registration Nos. 1812-293, -300, -304, -313, and -314 are acceptable. Alternate formulas using "Griffin" starting materials are also acceptable. It is understood that these basic and alternate formulas dated February 16, 1987 (using "Griffin" starting materials) replace previously accepted formulas for these products. Alternate formulas using Synchem starting material are not acceptable. Since this is an unregistered source of active ingredient, you must submit product chemistry describing this product. You are required to include offers-to-pay for data to support this alternate source of supply for the particular registrations involved since this constitutes a major amendment. We note that you have submitted a partial chemical analysis of the Synchem material. Please submit a complete analysis for both Synchem and Griffin copper sulfate pentahydrate materials.

The formula statement for EPA Registration No. 1812-319 does not support labeling for this product. Since this product contains 6.0% metallic copper, block 13 on the formula statement would be calculated as follows:

$$25.2\% \times (\text{Block 13}) = 6.0\%$$

The label active ingredient statement should read:

Copper expressed as metallic* . . . 6.0%

*from copper sulfate pentahydrate

Also, the lb/gallon statement should read:

contains 0.64 lb copper/gal

Revised labeling for EPA Registration Nos. 1812-293, -304, -313, and -314 is acceptable provided you:

1. Make the changes below before releasing the products for shipment bearing amended labeling:

- a. For EPA Registration Nos. 1812-293, -304, -313, and -314, modify the Hazards to Humans statement for eyes to read:

Corrosive. Causes irreversible eye damage.

Under Storage and Disposal for EPA Registration No. 1812-293, delete "spray mixture or rinsate" since this is a manufacturing-use product, and references to concentrate since these are crystals packaged in bags. For the remainder of these products add the complete pesticide disposal text for "acutely hazardous" materials from PR Notice 83-3. Also, add a statement to the front panel referring the user to additional precautionary statements.

- b. For EPA Registration No. 1812-304 under irrigation system control of algae and potamogeton pond weeds, include the suggested number of hours for each treatment. Also, immediately following directions for control of algae in impounded waters add:

(Refer to table below for recommended application rates)

- c. For EPA Registration Nos. 1812-313 and -314, delete instructions for calculating (1) weight of water; (2) active ingredient to achieve a given ppm level; and (3) water flow in ditches, etc. This information is unnecessary and/or inappropriate. Only the first paragraph in that section and the note regarding potable water should be included.

Under algaecide instructions, add recommended water volume for spray and move the phrase "0.27 ppm to 0.54 ppm (Cu)" so that it follows "3 to 6 lb per acre foot of water." Change the dosage rate for control of tadpole shrimp to 5 to 10 lb per acre.

Since a specific reentry interval for farmworkers is not required after sprays have dried, delete the 24-hour interval proposed or provide a rationale for inclusion.

2. Submit one (1) copy of final printed labeling incorporating the changes above.

A stamped copy of each label is enclosed for your records.

Labeling for EPA Registration No. 1812-319 is not acceptable. Since you are reporting a pH of 1.5, the appropriate signal word for this product is "DANGER." Use the same precautionary language as for the other copper sulfate pentahydrate products, substituting "skin burns" for "skin irritation" and adding "and rubber gloves" after "goggles." Add the Spanish signal word "PELIGRO" adjacent to the English signal word. Add pesticide disposal language for "acutely hazardous" substances from PR Notice 83-3. Modify algaecide and tadpole shrimp instructions per 1.c. above, inserting ppm figures immediately following "1.2 to 2.4 gallons" and changing tadpole shrimp rates to 2 to 4 gallons per acre.

Labeling for EPA Registration No. 1812-300 is not acceptable. Add the Spanish signal word "AVISO" adjacent to the English signal word and, the Spanish text from PR Notice 83-2, "Precaucion al usuario" Modify "Causes severe eye . . . irritation" to read "Causes substantial but temporary eye injury." Use appropriate environmental hazards language for terrestrial end-use products from page 13 in the Standard. There are also numerous problems with the revised directions/diseases proposed. Refer to the enclosed review for required modifications. Submit five (5) copies of revised draft labeling.

The Offer-To-Pay Form for EPA Registration No. 1812-319 was not properly filled out, i.e., the appropriate block was not checked for item 3. Please resubmit this document. Provide a new formula statement and five (5) copies of draft labeling for this product with your response.

The new product name for EPA Registration No. 1812-293, referred to above, is acceptable. We are also accepting the additional brand name - "Blue Viking Copper Sulfate Star Light Crystals" - under EPA Registration No. 1812-313.

Sincerely yours,



Richard F. Mountfort
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosures

Griffin

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GRIFFIN CORPORATION
VALDOSTA, GEORGIA 31601

Kocide[®]

TECHNICAL

COPPER SULFATE PENTAHYDRATE CRYSTALS

ACTIVE INGREDIENT
COPPER SULFATE PENTAHYDRATE...99%
INERT INGREDIENTS..... 1%
(METALLIC COPPER EQUIVALENT - 25.2%)
KEEP OUT OF REACH OF CHILDREN

DANGER — PELIGRO ✓

STATEMENT OF PRACTICAL TREATMENT
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 with plenty of water. Call a physician.

✓ IF SWALLOWED: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Note to Physician: Probable mucosal damage may contraindicate use of gastric lavage.

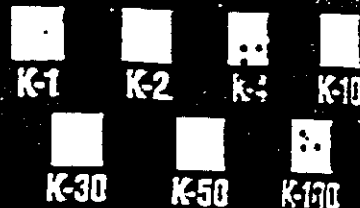
PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente.

EPA REG. NO. 1812-293

EPA EST. NO. 45450-812-293

TECHNICAL PRODUCT
FOR ALGAEICIDE
AND FUNGICIDE FORMULATION
AND NON-PESTICIDE
INDUSTRIAL USES.

CRYSTAL SIZES



MANUFACTURED BY:



KOCIDE CHEMICAL CORPORATION of Casa Grande
Casa Grande, Arizona 85222

A WHOLLY OWNED SUBSIDIARY OF GRIFFIN CORPORATION

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Corrosive

Causes severe eye and skin irritation. Harmful if absorbed through the skin or inhaled. May cause skin sensitization reactions in certain individuals. Avoid contact with the skin, eyes, or clothing. Avoid breathing dust. Protective clothing including goggles, should be worn. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

✓ ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water 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.

STORAGE AND DISPOSAL

PROBITIONS: Do not contaminate water, food or feed by storage or disposal. Open burning and dumping is prohibited. Do not re-use empty container.

STORAGE: Keep pesticide in original container. ~~X~~ Do not put concentrate or dilutions of concentrate in food or drug containers.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, ~~X~~ spray mixture, or insate is a violation of Federal Law. If these wastes cannot be disposed or 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: Dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

FORMULATION OF PESTICIDES: This product is a technical material for use by formulators of algacides and fungicides. All such products must be registered with the U.S. Environmental Protection Agency and licensed by appropriate state regulatory bodies. Formulators are responsible for providing supporting data for their formulation.

WARRANTY STATEMENT

GRIFFIN CORPORATION warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of GRIFFIN. In no case shall GRIFFIN be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. GRIFFIN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.



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