APR | 3 2001

Ms. Angela Tessier Registration Specialist GRIFFIN LLC P. O. Box 1847 Valdosta, GA 31602-1847

SUBJECT:

Label Amendment

Paraquat Dichloride Technical, EPA Reg. No. 1812-424

Your Submission Dated March 12, 2001

Dear Ms. Tessier:

The above mentioned amendment submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable provided you make the required changes listed below:

- a. It is recommended that the "Note to Physician" and any other "Notes" be placed directly below the "First Aid" section.
- b. Under the "Precautionary Statement" section change the "A NOISH/MSMA-approved Pesticide Respirator" to "a dust/mist filtering respirator (MSHA/NOISH approval number prefix TC-21C), or a NOISH approved respirator with any R, P or HE filter." Change "waterproof glove" to "Chemical Resistant Category A" "Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet" should be added directly above the "REMOVE contaminated clothing and wash separate from other laundry before reuse.
- c. It is recommenced that the "Precautionary Statement" be change to read as follows: "Fatal if inhaled. May be fatal if swallowed. Causes substantial but

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temporary eye injury. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Do not breathe spray mist. Do not inhale contaminated dust. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals."

d. Under the "Environmental Hazards" section change "Chemical Hazard" to "Physical and Chemical Hazard".

Submit one (1) copy of your final printed labeling before you release the product for shipment. The amended labeling supersede all previously accepted ones. A stamp copy of the labeling is enclosed for your records.

Sincerely,

Dan Rosenblatt

Acting Product Manager (2)

Herbicide Branch

Registration Division (7505C)

Enclosure

GRIFFIN PARAQUAT DICHLORIDE TECHNICAL

FOR FORMULATION OF PARAQUAT HERBICIDE PRODUCTS ONLY

INERT INGREDIENTS: 66.5%

Contains 3 lbs paraquat cation per gallon.

KEEP OUT OF REACH OF CHILDREN DANGER-POISON



ONE SWALLOW CAN KILL!

ACCEPTED HIL COMMENTS In EPA Letter Dated

APR 13 2001

Under the Federal Insecticide. Fundicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

SYMPTOMS ARE PROLONGED AND PAINFUL. ONSET OF SYMPTOMS MAY BE DELAYED FOR UP TO 3 DAYS AFTER SWALLOWING.

- READ STATEMENT OF PRACTICAL TREATMENT AND PRECAUTIONARY STATEMENTS ON SIDE PANEL.
- NEVER PUT INTO FOOD, DRINK OR OTHER CONTAINERS.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: IMMEDIATELY induce vomiting by touching back of throat with finger. Administer fluids and induce further vomiting. Do not induce vomiting or give anything by mouth to an unconscious person. GET TO A HOSPITAL OR PHYSICIAN FAST. PROMPT TREATMENT IS ESSENTIAL AND MUST BE INITIATED BEFORE SIGNS AND SYMPTOMS APPEAR. NOTE TO PHYSICIANS: Call GRIFFIN FOR MEDICAL INFORMATION AT 1-888-324-7598 at any hour to obtain toxicology and medical management consultation, a supply of bentonite clay and paraquat analysis. Symptoms following ingestion may be delayed up to 3 days. To be effective, treatment for paraquat poisoning must begin IMMEDIATELY. Treatment consists of binding paraquat in the gut with suspensions of bentonite clay or charcoal and removal of paraquat from the blood by prolonged charcoal hemoperfusion or continuous hemodialysis.

IF ON SKIN: IMMEDIATELY wash with soap and water. Remove and wash all contaminated clothing separate from other laundry with soap and hot water before reusing. Prolonged contact will cause severe irritation. Contact with irritated skin or a cut or repeated contact with intact skin may result in poisoning. GET MEDICAL ATTENTION.

IF IN EYES: IMMEDIATELY wash eyes with water for at least 15 minutes and get medical attention. Contact may cause eye injury. CALL A PHYSICIAN.

IF INHALED: EXPOSURE to contaminated plant dust may cause irritation, nose bleeds and may lead to poisoning.

GRIFFIN LLC VALDOSTA, GEORGIA EPA REG. NO. 1812-424 EPA EST NO. 46193-GTM-4

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER POISON

FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN. CAUSES IRREVERSIBLE EYE DAMAGE. CAUSES SKIN IRRITATION. MAY CAUSE ALLERGIC SKIN REACTION.

DO NOT get in eyes, on skin or on clothing. **DO NOT** inhale contaminated plant dust. **WASH SPLASHES** from skin and eyes immediately. **REMOVE** and wash contaminated clothing. **WASH** thoroughly with soap and water after handling and before eating, drinking or using tobacco

- When handling or mixing concentrate or when exposure to concentrate is possible wear:
 - -A NIOSH/MSMA-APPROVED PESTICIDE RESPIRATOR with any N, R, P, or HE filter
 - -Protective clothing (disposable suit/coveralls or long-sleeved shirt and pants)
 - -Full face shield
 - -Waterproof gloves
 - -Apron and waterproof footwear
- REMOVE contaminated clothing and wash separate from other laundry before reuse.

IMPORTANT: The effect of swallowing paraquat concentrate is far more severe than that which usually results from skin contact or inhalation of contaminated plant dust. This product should not cause injury if used according to label instructions. Follow the label as if your life depends on it.

ENVIRONMENTAL HAZARDS

WILDLIFE: This product is toxic to wildlife. Do not discharge effluent containing this product into lakes, streams, ponds estuaries, oceans or public waters unless this product is specifically identified and addressed in a National Pollutant Discharge Elimination System (NPDES) permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

CHEMICAL HAZARD: This product reacts with aluminum to produce hydrogen gas which may for a highly combustible gas mixture. Such gas could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source. Do not mix or store in containers or such systems made of aluminum or having aluminum fittings.

EQUIPMENT/CONTAINER: Flush all equipment with water after use each day. Paraquat is corrosive to aluminum. Aluminum equipment and aluminum structures that are exposed to solution or spillage should be flushed thoroughly with water immediately after use.

SPILLAGE DURING TRANSPORT

Emergency action: Notify police and fire departments immediately. For any spill, leak, fire or exposure in the United states, call CHEMTREC 1-800-424-9300. In other countries, call your local Griffin agent.

KEEP PUBLIC AND ANIMALS away from area. MARK ROADS AND WARN OTHER ROAD USERS. WEAR full face shield, rubber gloves, rubber boots and waterproof overalls during decontamination operations.

Clean up spills as soon as possible. Cover spill with generous amount of clay or loam soil to absorb liquid, using a stiff broom to insure intimate contact. Sweep onto shovel and transfer to plastic bag or other disposable container. Repeat operations until contaminated surfaces are dry. Finally, hose spill site with water if feasible.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product without complying with all label directions and warnings.

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

Only for formulation into a herbicide for the following uses:

- 1. Terrestrial Food: Alfalfa, Asparagus, Cassavas, Clover and other Legumes. Corn (pop, field and sweet), Cotton, Dry beans, Easter Lilies, Garlic, Guar, Mint, Onions, Pastures, Peanuts, Pigeon peas, Pineapple, Potato, Safflower, Small fruits, Small grains, Sorghum, Soybeans, Sugarcane, Sunflower, Taniers, Taro, Trees and Vines, Tyfon, Vegetables, Yams.
- 2. Terrestrial Nonfood: Conservation Compliance Lands, Conservation Reserve Lands, Federal Set-Aside Lands, Grasses grown for seed, Resin soaking (pines);
- 3. Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- 4. Uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

STORAGE: Store at temperatures above 32°F. Do not contaminate feed, foodstuffs or drinking water. Do not store next to feed or food, or transport in or on vehicles containing foodstuffs or feeds. For help with any spill, leak, fire or exposure involving this material, call CHEMTREC 1-800-424-9300.

PESTICIDE DISPOSAL: This product is acutely hazardous. Improper disposal of excess pesticide 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: Triple rinse (or equivalent). Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or dispose of by other procedures allowed by State and local authorities.

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Warranty before using this product.

WARRANTY STATEMENT

GRIFFIN 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. The exclusive remedy of any buyer of this product for any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price paid for this product or, at Griffin's election, the replacement of this product. GRIFFIN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.