

Pm 1a 2217-470

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

MAR 22 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

James A. Armbruster, Ph.D
CHEMICAL CONSULTANTS INTERNATIONAL
AGENT FOR: PBI/GORDON CORPORATION
7270 W 98TH TERRACE, SUITE 100
OVERLAND PARK, KS 66212

Subject: Label Amendment Submission of 09/01/93 in Response to PR Notice 93-7
EPA Reg. No. 2217-470
ALFA-SPRAY

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

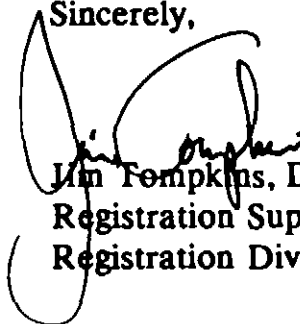
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkus, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

James A Armbruster, Ph D
CHEMICAL CONSULTANTS INTERNATIONAL
AGENT FOR: PBI/GORDON CORPORATION
7270 W 98TH TERRACE, SUITE 100
OVERLAND PARK KS 66212

Comment for: EPA Reg Nr.2217-470
ALFA-SPRAY

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

The glove requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or does not match the chemical-resistance category identified on your proposed labeling. Correct the chemical-resistance category statement (if necessary) to state: "Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for category G on EPA chemical resistance category selection chart. Remove the incorrect glove requirement (if any) and add "Chemical-resistant gloves, such as barrier laminate or viton." The exact location is shown in Sections A and B on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Add "Organophosphate" to your label in one of the locations shown in Section E on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

You have incorrectly placed inside the Agricultural Use Requirements box on your proposed labeling the prohibition against applying the product so it contacts any person (and related statements). Remove the following statements from

CHEMICAL CONSULTANTS INTERNATIONAL
EPA Reg. Number: 2217-470
ALFA-SPRAY
Application date: 09/01/93
Original Submission

the Agricultural Use Requirements box and place them in the Directions For Use section on your labeling immediately following (or below) the sentence "It is a violation of Federal law to use this product in a manner inconsistent with its labeling.": "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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation." The exact location is shown in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

ALFA-SPRAY

ACTIVE INGREDIENTS:

*Methoxychlor: 1,1,1-trichloro-2,2-bis (p-methoxyphenyl) ethane	23.787%
Malathion: O,O-dimethyl phosphorodithioate of diethyl mercaptosuccinate	23.807%
INERT INGREDIENTS	52.406%
TOTAL	100.000%

This product contains:

- 2.1 lbs. 1,1,1-trichloro-2,2-bis(p-methoxyphenyl)ethane per gallon.
- 2.1 lbs. O,O-dimethyl phosphorodithioate of diethyl mercaptosuccinate per gallon.

This product contains petroleum distillates.

*Equivalent to 20.814% 1,1,1-trichloro-2,2-bis(p-methoxyphenyl) ethane and 2.973% other isomers and reaction products.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panels for additional Precautionary Statements.

NET CONTENTS ONE GALLON

805/993WPS AP
 EPA REG. NO. 2217-470
 EPA EST. NO. 2217-KS-1

Mfd. by PBI/GORDON CORPORATION
 KANSAS CITY, MISSOURI 64101

ACCEPTED
 with COMMENTS
 in EPA Letter Dated
 MAR 22 1994

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.
2217-470

STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid breathing of dust or spray mist. Avoid contact with skin. Wash thoroughly after using.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves such as barrier laminate or Viton \geq 14 mils, and shoes plus socks.

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 Control Statements:

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.

Statement of Practical Treatment

An organophosphate insecticide.

IF SWALLOWED: Call a physician immediately. Do not induce vomiting. Vomiting may cause aspiration pneumonia.

IF IN EYES: Flush eyes with plenty of water. Get medical attention.

IF ON SKIN: ~~Remove contaminated clothing and~~ wash affected area with soap and water. Get medical attention if irritation persists.

IF INHALED: Remove victim to fresh air and apply artificial respiration if indicated. Get medical attention.

NOTE TO PHYSICIAN: Malathion upon repeated exposure may cause cholinesterase inhibition. Atropine is antidotal. Aromatic solvent may present aspiration hazard. Gastric lavage is indicated if product was swallowed.

Environmental Hazards: This pesticide is toxic to fish, aquatic invertebrates, and aquatic life stages of amphibians. 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. Drift and runoff may be hazardous to aquatic organisms in areas near the application site. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment 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.

Physical or Chemical Hazards: Do not use or store near heat and open flame.

DIRECTIONS FOR USE

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

~~Do not enter or allow entry into treated areas until sprays have dried and vapors have dispersed to perform hand labor tasks. A person may enter the area to perform other tasks only if the person is wearing the personal protective equipment listed on the label for a pesticide handler.~~

~~Do not apply this product in a way that will contact unprotected workers, either directly or through drift. Only protected handlers wearing long pants, long sleeved shirts, socks, shoes and chemical resistant gloves may be in the area during application.~~

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 label about personal protective equipment 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.

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For any requirements specific to your State, consult the agency in your State responsible for pesticide regulation.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

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, wear coveralls, chemical resistant gloves such as barrier laminate or Viton \geq 14 mils, and shoes plus socks.

STORAGE & DISPOSAL

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

STORAGE: Store in original container in a locked storage area inaccessible to children or pets.

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). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

ALFALFA: For control of alfalfa weevil, spittlebug, leafhopper and aphids.

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

AERIAL APPLICATION: Use recommended amount of ALFA-SPRAY for each specific crop with a minimum of 3 gallon of water per acre consistent with crop growth and good coverage.

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FIRST CUTTING: Apply 2 to 3 quarts per acre as soon as weevil damage appears in the field. Early application is desired to control the weevil when they are small. Do not apply within 7 days of harvest. Do not apply after full bloom.

STUBBLE SPRAYING: In areas where weevil appears at cutting time, remove the first cutting and apply 2 to 3 quarts per acre to the stubble to control weevil larvae and aphids.

SECOND AND SUBSEQUENT CUTTINGS: Apply 2 to 3 quarts per acre to control alfalfa weevil, leafhopper and aphids as these insects appear. Do not apply within 7 days of harvest.

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.