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File 10F9



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

JAN 6 1994

**Joanne Pratt
WILBUR ELLIS CO.
191 W. Shaw Avenue
Fresno, CA 93704**

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

**Subject: Label Amendment Submission of 09/10/93 in Response to PR Notice 93-7
EPA Reg. No. 2935-361
RED TOP THIMET 6.5% SYST. INSECT W/PCNB 6.5% SOIL**

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

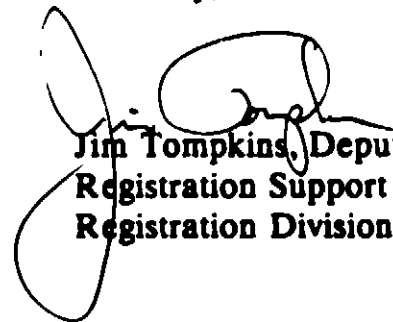
Submit the final printed labeling via the U.S. Postal Service to:

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 Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

RESTRICTED USE PESTICIDE
 Due to acute oral and dermal toxicity and environmental hazards.
 For retail sale to and application only by certified applicators or personnel under their direct supervision and only for those uses covered by the certified applicator's certification.

ADDENDUM
 with COMMENTS 3019
 In EPA Letter Dated

JAN 6 1994

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

2935-361



THIMET® 6.5% SYSTEMIC INSECTICIDE WITH PCNB 6.5% SOIL FUNGICIDE GRANULAR ORGANOPHOSPHATE

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER — POISON

POISONOUS BY SKIN CONTACT, INHALATION OR SWALLOWING. RAPIDLY ABSORBED THROUGH SKIN. REPEATED INHALATION OR SKIN CONTACT MAY, WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE SUSCEPTIBILITY TO POISONING. DO NOT GET IN EYES, ON SKIN, ON CLOTHING. DO NOT BREATHE DUST.

KEEP OUT OF REACH OF DOMESTIC ANIMALS.

PERSONAL PROTECTIVE EQUIPMENT

WEAR THE FOLLOWING PROTECTIVE CLOTHING DURING LOADING, APPLICATION, EQUIPMENT REPAIR/CLEANING, AND DISPOSAL OF THE PESTICIDE: A protective suit of one or two pieces covering all parts of the body except head, hands, and feet; chemical resistant gloves, chemical resistant shoes, shoe covering, or boots. Wear goggles and a pesticide respirator approved by NIOSH or MSHA.

Unless a chemical resistant protective suit is otherwise required, mixers/loaders must wear a chemical resistant apron and goggles or a face shield.

The respirator need not be worn during equipment repair and cleaning and during early reentry after dust has settled.

IF APPLICATION IS PERFORMED USING AN ENCLOSED CAB OR COCKPIT, THE FOLLOWING PROTECTIVE CLOTHING AND EQUIPMENT MAY BE WORN AS AN ALTERNATE: Long-sleeved shirt and long-legged pants; shoes and socks. Chemical resistant gloves must be available in the cab cockpit and must be worn when exiting. This clothing is inadequate to protect you during equipment repair or cleaning, entry, or pesticide disposal work. Do not allow contaminated clothing to come in contact with the inside of the cab.

IMPORTANT! If pesticide comes in contact with skin, wash off with soap and water. Always wash hands, face, and arms with soap and water before smoking, eating, drinking, or using the toilet.

AFTER WORK: Before removing gloves, wash them with soap and water. Take off all work clothes and shoes. Shower using soap and water. Wash clean clothes. Do not reuse contaminated clothing. Personal clothing worn during work must be laundered separately from household articles. Store protective clothing separately from personal clothing. Clean and under protective clothing after each use. Respirators must be cleaned and stored replaced according to instructions included with the respirator. Clothing and protection equipment heavily contaminated must be destroyed according to state and local regulations. **HEAVILY CONTAMINATED CLOTHING CANNOT BE ADEQUATELY DECONTAMINATED.**

DURING AERIAL APPLICATION, HUMAN FLAGGERS ARE PROHIBITED UNLESS IN A TOTALLY ENCLOSED VEHICLE.

—WORK SAFETY RULES—

REPEATED EXPOSURES TO CHOLINESTERASE INHIBITORS SUCH AS ARE CONTAINED IN THIS PRODUCT MAY, WITHOUT WARNING, CAUSE PROLONGED SUSCEPTIBILITY TO VERY SMALL DOSES OF ANY CHOLINESTERASE INHIBITOR

Persons working with this product should have frequent blood tests of their cholinesterase levels. If the cholinesterase level falls below a critical point, no further exposure should be allowed until it has been determined by means of blood tests that the cholinesterase level has returned to normal. Before using this product consult the National Pesticide Telecommunications Network for recommendations regarding such blood tests, poisoning management, emergency treatment, and other information regarding the toxicity of phospha. The toll-free number for the National Pesticide Telecommunications Network is 1-800-858-7378. If handled indoors, provide mechanical exhaust ventilation.

Keep off unprotected persons, children, livestock, and pet animals from treated areas 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.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and wildlife. Birds feeding on 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. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Collect or incorporate granules that are spilled during loading or are visible on soil surface in turn areas. Do not contaminate water when disposing of equipment washwaters.

REPLACE WITH DIRECTIONS FOR USE COPY D

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

RE-ENTRY

After dusts have settled, do not enter or allow entry into treated areas until the 48-hour reentry interval has expired, unless the person entering the treated area is wearing the personal protective equipment listed below for early reentry.

For early reentry into treated areas, wear a protective suit of one or two pieces covering all parts of the body except head, hands, and feet; chemical resistant gloves and chemical resistant shoes, shoe coverings, or boots.

STORAGE AND DISPOSAL

- Prohibitions:** Do not contaminate water, food or feed by storage or disposal.
- Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or residue is a violation of Federal law. If these wastes cannot be disposed of by use according to labeling instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office, for guidance.
- Container Disposal:** Completely empty bag into application equipment. Then 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.
- Storage:** Store in original container or only and keep sealed. Store in closed storage areas. Use caution when moving, opening, closing or pouring.

DIRECTIONS

DO NOT CONTAMINATE FOOD OR FEED PRODUCTS. Remove unprotected persons and domestic animals from operating and adjacent areas where this product may drift; prohibit re-entry until drift and vapor dissipate.

Not for use or storage in or around the home.

For the control of early season insects (Mites, Thrips, Aphids) and Phylloxera (damping-off, seed and seedling rot) on COTTON, apply THIMET 6.5% PCNB 6.5% Granular at the rate of 15 lbs. per acre in the furrow at planting time. This dosage is based on 36-inch row spacing. Do not apply within 30 days of harvest. Do not apply more than twice per season. Allow a minimum of 21 days between applications. Do not treat hay or forage to livestock.

Do not plant root crops in PCNB treated fields within 12 months of broadcast and banding applications unless PCNB is registered for use on these crops.


46052

ACTIVE INGREDIENTS:
 Phospha (O,O-diethyl S-(diethylthio)methyl) phosphorothioate 91.0%
 Pentachloronitrobenzene (PCNB) 6.0%
INERT INGREDIENTS 97.0%
 100%

EPA Reg. No. 2935-361-AA EPA Est. No. 33001-A

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO POISON



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

FIRST AID TREATMENT

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back throat with finger, or, if available, by administering syrup of ipecac. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen.

In Case of Contact: Immediately flush eyes or skin with plenty of water for at least 15 minutes while removing clothing. Wash contaminated clothing thoroughly.

NOTE TO PHYSICIANS: Warning symptoms include weakness, headache, tightness in chest, blurred vision, non-rapid eye ping-pong pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps. Give atropine intravenously, orally or intramuscularly, depending on severity of poisoning. 2 to 4 milligrams, or more, may be required during the first 2 hours. Never give epinephrine or phenothiazine tranquilizers. Clear chest by postural drainage. Artificial respiration or oxygen administration may be necessary. Observe patient continuously for at least 48 hours. Allow no further exposure to or cholinesterase inhibitor, until cholinesterase regeneration has taken place as determined by blood tests.

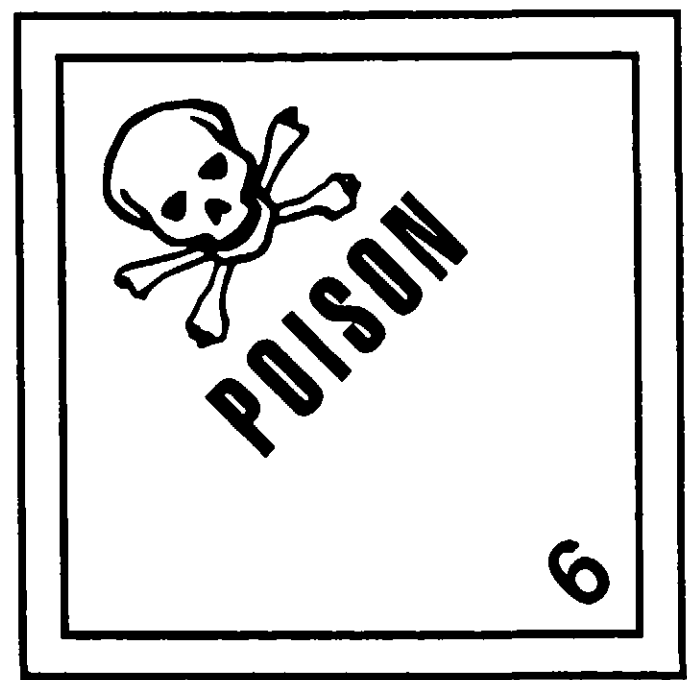
Pralidoxime chloride (2-PAM; PROTOPAM chloride) may be effective as an adjunct to atropine. Use according to label directions.

CALL A PHYSICIAN IN ALL CASES OF SUSPECTED POISONING!

SEE PRECAUTIONARY STATEMENTS IN LEFT PANEL

* Reg. Trademark of American Cyanamid Company
 Logo TM of WILBUR-ELLIS Company.
 IDEAS TO GROW WITH is a registered trademark of WILBUR-ELLIS Company

IN CASE OF EMERGENCY, CALL CHEMTREC: (800) 424-9300



ORGANIC PHOSPHATE COMPOUND MIXTURE, DRY, NA 2783

→ Add: Copy B
 Copy J
 Copy H

→ Replace with I

BEST AVAILABLE COPY

COPY B

Personal Protective Equipment
Applicators and other handlers must wear:

- A) Coveralls over long sleeved shirt and long pants.
- B) *Waterproof gloves*
- C) Chemical-resistant footwear plus socks.
- D) Protective eyewear.
- E) Chemical-resistant headgear for overhead exposure.
- F) Chemical-resistant apron when cleaning equipment, mixing or loading.
- G) A respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

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.

COPY D

DIRECTIONS FOR USE

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.

AGRICULTURE 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, greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontaminations, notification, and emergency assistance. It also contains specific instructions, and exceptions pertaining to protective equipment (PPE), notification to workers, and restricted entry interval. The requirements in this box are covered by the Worker Protection Standard.

missing language

Do not enter or allow workers entry into treated areas during the restricted entry interval (REI) of 48 hours.

The REI is 72 hours in outdoor areas where average annual rainfall is less than 25 inches a year.

COPY D
continued

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:

- A) Coveralls over long sleeved shirt and long pants
- B) *Waterproof gloves*
- C) Chemical-resistant footwear plus socks
- D) Protective eyewear
- E) Chemical-resistant headgear for overhead exposure.

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

COPY H**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.

COPY I

a
Si usted no entiende la etiqueta,
busque alguien 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).

COPY J

Engineering Controls 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.