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Mr. Terry Miller
Wilbur Ellis Company
Agricultural Services Corporate Office
191 West Shaw Avenue
Suite 107
Fresno, CA 93704-2876

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Dear Mr. Miller:

Subject: Update Labeling and Confidential Statement of Formula
Red-Top Di-Syston Systemic with PCNB Fungicide Granular
EPA Registration No. 2935-362
Your Applications Dated December 29, 1986 and
January 8, and January 12, 1987

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Under the Re-Entry paragraph add:

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons. Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. When oral warnings are given, warnings shall be given in a language customarily understood by the workers. Written warnings must include the following information:

DANGER

(Insert area or field description) treated with Di-Syston and Terraclor on (insert date of application). Do not enter treated areas without protective clothing within 24 hours after application.
In case of accidental exposure: Call a physician, clinic or hospital immediately. Explain that the victim has been exposed to Di-Syston and Terraclor and

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describe his condition. For further information see the "Statement of Practical Treatment" on the product label.

Oral warnings must include the same information that is in the written warnings.

2. PR Notice 87-3 removes the need for the crop rotation statement for disulfoton. However, the statement "Do not plant root crops in PCNB treated fields within 12 months of broadcast and banding applications unless PCNB is registered for use on those crops" is needed in place of the disulfoton paragraph.

3. The sentence should read "Cover or incorporate granules that are spilled during loading or are visible on the soil surface after application."

4. Update the environmental hazards by changing "by cleaning of equipment or disposal of wastes" to "when disposing of equipment washwaters."

5. Add "Do not let the feeding or grazing of cotton foliage by livestock."

There were some statements missing on your October 13, 1987 label, which was accepted by the Agency letter from Lois Rossi on February 22, 1988, that are needed. These changes are listed below:

1. Add the "Reentry Statement" section as it appears on your other labeling with the addition to this section which is listed above in item #1.

2. Add "This pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning" to the bottom of the environmental hazards section.

3. Add "Wear goggles, face shield or safety glasses" to the Work Safety Rules section.

4. The section title is "Statement of Practical Treatment" not "First Aid Treatment." Also under this section change the In Case Of Contact statement back to the following:

If On Skin: Remove contaminated clothing and wash affected areas with soap and water.

If In Eyes: Flush eyes with plenty of water.
Call a physician immediately.

The corrected Confidential Statement of Formula is acceptable and has been made a part of the record for this product.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,

George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7505C)

human and inhalation

large type 1/2 pt

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RESTRICTED USE PESTICIDE

Due to acute oral and dermal toxicity, and ~~high toxicity~~

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.

RED-TOP

DI-SYSTON® 6.5% SYSTEMIC INSECTICIDE WITH PCNB 6.5% SOIL FUNGICIDE GRANULAR

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.

KEEP OUT OF REACH OF DOMESTIC ANIMALS.

WORK SAFETY RULES

DO NOT GET IN EYES, ON SKIN, ON CLOTHING. Wear freshly laundered long-sleeved shirt, long pants, shoes, and socks, and rubber gloves, while transferring from package to equipment. Rubber gloves should be washed with soap and water after each use. Do not wear the same gloves for other work. Destroy and replace gloves frequently.

wear goggles, face shield or safety glasses,

Wear a respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health for pesticide application under the provisions of 30 CFR Part 11.

Wash thoroughly with soap and water before eating or smoking. Bathe at the end of the work day and change outer clothing. In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water. Launder clothing before reuse.

DO NOT BREATHE DUST. While emptying bags to equipment, pour downwind and allow as little free fall as possible. Do not pour at face level and do not allow dust to reach the breathing zone.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not apply directly to water or wetlands. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes. Cover or incorporate

granules that are spilled during loading, or are visible on soil surface in turn areas.

This pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum activity, usually between late evening and early morning.

DIRECTIONS FOR USE

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

REENTRY STATEMENT

Do not allow reentry into treated fields within 24 hours of application unless appropriate

ACTIVE INGREDIENTS:

Disulfoton [O,O-Diethyl S-2-(ethylthio) ethyl phosphorodithioate] 6.5%

Pentachloronitrobenzene 6.5%

INERT INGREDIENTS 87.0%

100.0%

© Di-Syston is a Reg. T.M. of Farbenfabriken Bayer A.G., Chemagro Corp. license.

EPA Reg. No. 2935-362-AA

EPA Est. 33691-AZ-1

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 completamente.

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician immediately.

NOTE TO PHYSICIANS: Warning symptoms include weakness, headache, dizziness in chest, blurred vision, nervousness, general malaise, nausea, vomiting, diarrhea and abdominal cramps. Give oxygen intravenously or intratracheally, depending on severity of poisoning. 2 to 4 milligrams every 10 minutes until fully aroused as shown by dilated pupils, dry flushed skin and tachycardia. Toxicity to thirty milligrams, or more, may be required during the first 24 hours. Have gas oxygen or phenothiazine tranquilizer. Clear chest by postural drainage. Artificial respiration or oxygen administration may be necessary. Observe patient continuously for at least 48 hours. After no further exposure to any cholinesterase inhibitor and cholinesterase re-esteration has taken place as determined by blood tests.

Precautionary statements (2-FM), PROTOGRAM chemical may be effective as an antidote to organophosphates. Use according to label directions.

SEE PRECAUTIONARY STATEMENTS IN LEFT PANEL

DIRECTIONS (Continued)

STORAGE AND DISPOSAL

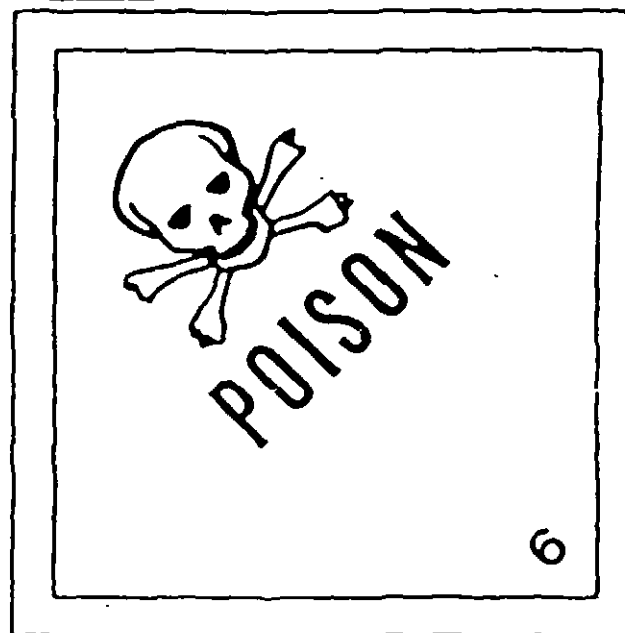
1. Prohibitions: Do not contaminate water, food, or feed by storage or disposal.
2. Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional office for guidance.
3. 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.
4. Storage: Store in original container 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.

Do not plant any food or feed crop in rotation after a field treatment with disulfoton unless it is a registered use for disulfoton for one growing season.

tonia (damping-off, seed and seedling rot) on COTTON, apply DI SULFOTON 6.5 PCNB 6.5 Granular at the rate of 15 lbs. per acre in the furrow at planting time. This dosage based on 30 inch row spacing. Do not apply within 28 days of harvest. Do not apply more than twice per season. Allow a minimum of 21 days between applications.



RQ DISULFOTON MIXTURE, DRY
NA 2783

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

NOTICE: The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILBUR-ELLIS COMPANY does not make, nor does it authorize any agent or representative to make, any warranty, guaranty or representation, express or implied, concerning this material or the use thereof, except in conformity with the statements on the label. Neither WILBUR-ELLIS COMPANY nor the seller shall be responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on these conditions.

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work. Destroy and replace gloves frequently.

Wear goggles, face shield or safety glasses,

Wear a respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health for pesticide application under the provisions of 30 CFR Part 11.

Wash thoroughly with soap and water before eating or smoking. Bathe at the end of the work day and change outer clothing. In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water. Launder clothing before reuse.

DO NOT BREATHE DUST. While emptying bags into equipment, pour downwind and allow as little free fall as possible. Do not pour at face level and do not allow dust to reach the breathing zone.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife.

Do not apply directly to water or wetlands. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes. Cover or incorporate spills.

Cover or incorporate granules that are spilled during loading, or are visible on soil surface in turn areas.

This pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

DIRECTIONS FOR USE

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

REENTRY STATEMENT

Do not allow reentry into treated fields within 24 hours of application unless appropriate protective clothing is worn.

STORAGE AND DISPOSAL

1. **Prohibitions:** Do not contaminate water, food, or feed by storage or disposal.
2. **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 State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.
3. **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.
4. **Storage:** Store in original container 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.

Do not plant any food or feed crop in rotation after a field treatment with disulfoton unless it is a registered use for disulfoton for one growing season.

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician immediately.

NOTE TO PHYSICIANS: Warning symptoms include weakness, headache, tightness in chest, blurred vision, nervousness, pinpoint pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps. Give oxygen intravenously or intramuscularly depending on severity of poisoning. 2 to 4 milligrams every 10 minutes until fully conscious as shown by dilated pupils, dry flushed skin and tachycardia. Twenty to thirty milligrams, or more, may be required during the first 24 hours. Monitor vital signs and 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 any cholinesterase inhibitor until cholinesterase regeneration has taken place as determined by blood tests.

Prothrombin chloride (2-Phat; PROTOPHAT chloride) may be effective as an antidote to organophosphates. Use according to label directions.

SEE PRECAUTIONARY STATEMENTS IN LEFT PANEL

DIRECTIONS (Continued)

Not for use or storage in or around the home.

For the control of early season insects (Mites, Thrips, Aphids), and Rhizoctonia (damping-off, seed and seedling rots) on COTTON, apply DI SYSTEM 6.5 PCNB 6.5 Granular at the rate of 15 lbs. per acre in the furrow at planting time. This dosage based on 38 inch row spacing. Do not apply within 28 days of harvest. Do not apply more than twice per season. Allow a minimum of 21 days between applications.



RQ DISULFOTON MIXTURE, DRY
NA 2783

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

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Wilbur-Ellis

P.O. BOX 16458, FRESNO, CA 93755

WILBUR-ELLIS COMPANY
in EPA Label 2783

MAR 4 1977

Under the authority of the
Fungicide, Insecticide, and
Plant Growth Regulator Act,
amended, 1974, and the
Federal Insecticide, Fungicide,
and Plant Growth Regulator Act,
listed under EPA Reg. No. 2930-362