

Reg # 2935-362

PM-13

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

JAN 31 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Joanne Pratt
WILBUR ELLIS CO.
191 W SHAW AVE
FRESNO, CA 93704

Subject: Label Amendment Submission of 09/10/93 in Response to PR Notice 93-7
EPA Reg. No. 2935-362
RED-TOP LI-SYSTON 6.5% SYSTEMIC W/PCNB SOIL FUNGIC

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:

Submit the required notification. Then 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 as amended

AND

- **WITHIN** one year from date of this acceptance.

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**

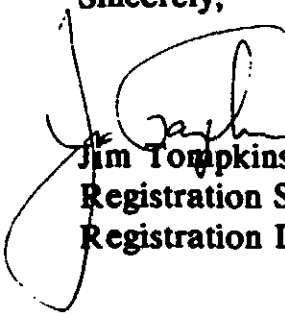
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Page 4

Hand or courier deliveries of final 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

cc: Office of Compliance Monitoring

5910

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



DI-SYSTON® 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.

NOTE TO PHYSICIAN: Warning symptoms include weakness, headache, lightness of chest, blurred vision, non-reactive pinpoint pupils, dilation, sweating, nausea, vomiting, diarrhea and abdominal cramps.

ANTIDOTE: Atropine and 2-PAM are antidotes. Consult your physician about obtaining a supply of 1 grain (0.8 milligram) tablets for emergency use. If symptoms include blurred vision, stomach cramps or lightness in chest, don't wait for a physician but take two tablets at once. Do not take Atropine unless symptoms of poisoning have occurred. Anyone who has been sick enough to have taken Atropine may be seen by a physician as soon as possible.

KEEP OUT OF REACH OF DOMESTIC ANIMALS.

WORK SAFETY RULES

DO NOT GET IN EYES, ON SKIN, OR 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 same gloves for other work. Destroy and replace gloves frequently. Wear a respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provision of 30 CFR Part 11. Wash thoroughly with soap and water before eating or smoking. Baths 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 down-wind and allow dust to fall as possible. Do not pour at face level and do not allow dust to reach the breathing zone.

ENVIRONMENTAL HAZARDS

Highly toxic to fish, aquatic organisms and wildlife. 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. Cover or incorporate granules. Birds feeding on treated areas may be killed. Do not apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

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 area. 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 root crops in PCNB treated fields within 12 months of broadcast and banding applications unless PCNB is registered for use on those crops.

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 SYSTON 6.5 PCNB 6.5 Granular at the rate of 15 lbs. per acre in the furrow at planting time. This dosage based on 36 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.

Do not allow the feeding or grazing of cotton foliage by livestock.


46057

ACCEPTED with COMMENTS in EPA Letter Dated

JAN 31 1991

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2935-362

→ Replace with: Copy B Copy 11

KEEP OUT OF REACH OF CHILDREN
DANGER PELIGRO  **POISON**

ACTIVE INGREDIENTS:

O,O-Diethyl S-2-(diethylthio)ethyl phosphorodithioate	6.5%
Pentachloronitrobenzene (PCNB)	6.5%
INERT INGREDIENTS	87.0%
	100.0%

EPA Reg. No. 2935-362-AA

EPA Est. No. 33091-AZ-1

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido traducida a su idioma.

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 of 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 and shoes. Wash clothing before reuse.

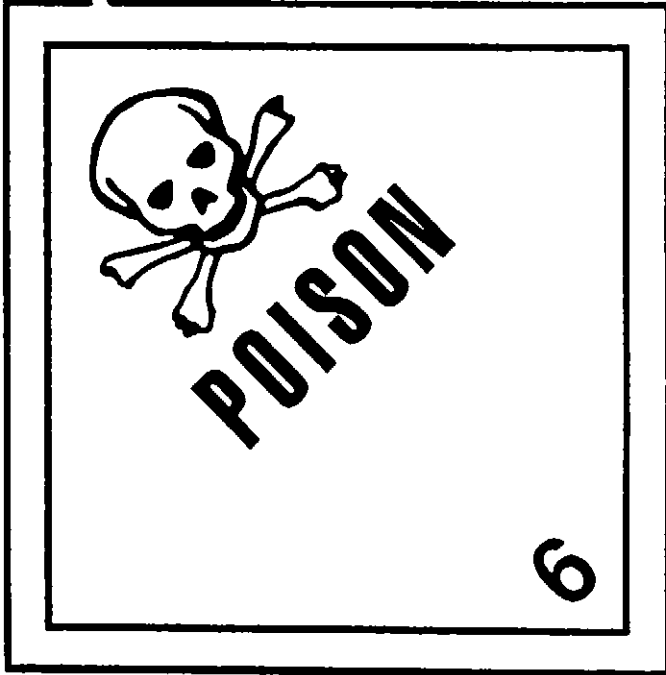
CALL A PHYSICIAN IN ALL CASES OF SUSPECTED POISONING!

SEE PRECAUTIONARY STATEMENTS IN LEFT PANEL

*Di-Syston is a Reg. TM of Farbwerke/Bayer A.G., Chemagro Corp. license. Logo TM of WILBUR-ELLIS Company. IDEAS TO GROW WITH is a registered trademark of WILBUR-ELLIS Company.

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



RQ, DISULFOTON MIXTURE, DRY NA 2783

BEST AVAILABLE COPY

COPY B

Personal Protective Equipment
Applicators and other handlers must wear:

- A) Coveralls over long sleeved shirt and long pants.
- B) *Water proof 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) Dust/mist filtering respirator (MSHA/NIOSH approval prefix TC-21C).

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.

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

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).