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MAP - 1 1989

Mr. John S. Thornton
 Mobay Corporation
 Agricultural Chemicals Division
 P.O. Box 4913
 Kansas City, MO 64120-0013

Dear Mr. Thornton:

Subject: Amendment - Response to Disulfoton Registration Standard
 (Revised Labels)
 Di-Syston 2 $\frac{1}{2}$ Granular Systemic Insecticide for Repack Only
 EPA Registration No. 3125-128
 Your Application Dated July 25, 1985

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

1. The word Disulfoton should precede the chemical name in the ingredients statement.
2. Switch the location of "Keep Out of Reach of Children" and "Precautionary Statements, Hazards to Humans."
3. Change the Note to Physician as follows:

Note to Physician: Gastric lavage may be indicated if product was taken internally. Disulfoton is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

4. Change the first sentence of the container disposal section to "Do not reuse empty container."

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CONCURRENCES

SYMBOL							
SURNAME							
DATE							

- 5. We note that since issuance of the Registration Standard for Disulfoton, Mobay has decided to drop certain uses. Please assure yourself that the end-uses identified under "Directions for Use" are those uses Mobay intends to support. Please modify (correct) as appropriate.
- 6. Revise the pesticide disposal statement in accordance with PR Notice 83-3. Disulfoton is considered a "Hazardous Waste" under Sections 261.33(e) and (g) of Title 40 of the Code of Federal Regulations when discarded and the product is also assigned Toxicity Category II on the basis of acute inhalation toxicity.

Please provide the specification sheets for the clay and the type clay used in this product.

Also, submit a new Confidential Statement of Formula which includes the certified limits.

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)

Enclosure

BLD19

Base Reg. (5238)

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U.S. LABEL

Reason to Issue: To update according to reregistration standard for disulfoton.

Date of Draft: 7/16/85 (S)
Supersedes Draft Dated: 5/18/83

EPA Reg. No. 3125-128

To Be Printed As A Single Panel Label

® DI-SYSTON

2Z GRANULAR

SYSTEMIC INSECTICIDE

AN INSECTICIDE FOR REPACKAGING ONLY - NOT FOR RESALE

ACTIVE INGREDIENT:

O,O-Diethyl S-[2-(ethylthio)ethyl] phosphorodithioate 2Z

INERT INGREDIENTS: 98Z
100Z

EPA Reg. No. 3125-128
EPA Est. No. 3125-1A-1

ACCEPTED
with COMMENTS
EPA Letter Dated:

PRECAUTIONARY STATEMENTS

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HAZARDS TO HUMANS

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

WARNING

3125-128

KEEP OUT OF REACH OF CHILDREN

Poisonous if swallowed, inhaled, or absorbed through the skin. Rapidly absorbed through the skin. Do not get in eyes or on skin. Wear protective clothing, natural rubber gloves, and goggles. Do not breathe dust. Wear a mask or 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 provisions of 30 CFR Part 11. Keep all unprotected persons out of the operating area or vicinity. Wash hands, arms, and face thoroughly with soap and warm water before eating or smoking. Wash all contaminated clothing with soap and hot water before reuse.

SYMPTOMS OF POISONING: A sense of "tightness" in the chest. Sweating. Contracted pupils. Stomach pains. Vomiting and diarrhea.

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DI-SYSTON 2X Granular

STATEMENTS OF PRACTICAL TREATMENT

If swallowed, vomiting should be induced. Administer water freely and induce vomiting by giving one dose (1/2 oz. or 15 ml.) of syrup of ipecac. If vomiting does not occur within 10 to 20 minutes, administer second dose. If syrup of ipecac is not available, induce vomiting by sticking finger down throat. Repeat until vomit fluid is clear. Never give anything by mouth to an unconscious person. Professional medical assistance should be secured immediately. 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 if irritation persists.

To Physician - Atropine sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an 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 the EPA.

DIRECTIONS FOR USE

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

DI-SYSTON 2X Granular is intended for repackaging into end use products for:

Terrestrial, food uses on:

Beans, Brussels sprouts, cauliflower, broccoli, cabbage, lettuce, peas, potatoes, spinach, tomatoes.

Domestic outdoor use on:

Potted plants, ornamentals (herbaceous plants, flowers, woody shrubs, trees)

Domestic indoor use on:

Potted plants, ornamentals (specified above)

Greenhouse non-food use on:

Ornamentals (specified above)

Labeling for products repackaged from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Mobay. Any variance from the federally registered labeling for products containing DI-SYSTON will have to be supported by data provided by the repacker.

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DI-SYSTON 2X Granular

STORAGE AND DISPOSAL

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

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Do not use container in connection with food, feed, or drinking water. Completely empty container into repackaging equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed above. In spill or leak incidents, keep unauthorized people away. You may contact the Mobay Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Mobay Kansas City Emergency Response Telephone No. is 816-242-2582, or contact Chemtec at 800-424-9300.

NET CONTENTS 50 POUNDS

DI-SYSTON is a Reg. TM of the Parent Company of Farbenfabriken Bayer GmbH, Leverkusen.

MOBAY CHEMICAL CORPORATION
AGRICULTURAL CHEMICALS DIVISION
Box 4913, Kansas City, Mo. 64120

Note: Underlined letters in chemical nomenclature should be italicized when printed, not underlined.