455 13 MAR - 133

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 Seed Treatment Insecticide
EPA Registration No. 3125-173
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.

- The word "Disulfoton" should precede the chemical name in the ingredients statement.
- 2. For both specimen labels, change the signal word from "Warning" to "Danger" and place the word "Poison" near it. Also, place the skull and crossbones between these two words.
- 3. For both specimen labels, near the word "Poison" at the top, add the following:
  - a. The word "Danger."
  - b. Skull and crossbones between these words.
  - c. Add "Keep Out of Reach of Children" above the "Danger, Poison" statement.

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4. Under "Restrictions," add:

Treated seed must not be used for or mixed with food or animal feed, or processed for oil. Seed commercially treated with this product must be labeled in accordance with all applicable requirements of the Federal Seed Act.

5. The Statement of Practical Treatment must appear on the front panel preferably in "blocked" format.

For the data matrix, please provide the following information:

- Certification of Limits--upper and lower limits of each active and individually added inert component, together with a brief discussion of how these limits were established - by analysis or by calculation. Active ingredients are normally determined by analysis, and inerts by calculation from weighings during the formulation process. Please note the lower limit for the active ingredient must not fall below the label claim.

The submission of data and the Confidential Statement of Formula have been noted and 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)

Enclosure

BLD19

U.S. LABEL (S)

Base Reg. (5243)

Reason to Issue: To update according to reregistration guidance document.

Date of Draft: 7/16/85 (S)

Supersedes Draft Dated: 8/29/84

EPA Reg. No. 3125-173-AA

#### RESTRICTED USE PESTICIDE

Acute human oral, dermal, and inhalation toxicity

For retail sale to, and use only by, Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

®1-SYSTON

**ACCEPTED** with comments In EPA Letter Dated

#### SEED TREATMENT INSECTICIDE

FOR USE ONLY BY COMMERCIAL SEED TREATERS

LOW ODOR FORMULATION

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Ther the Federal Insection

ered under EPA

Pungicide, and Rodenticide Act amended, for the per

95%

100Z

KEEP OUT OF REACH OF CHILDREN

DANGER POISON

Atropine sulfate is antidotal. Consult physician for emergency supply.

(See Rear Panel for Statements of Practical Treatment and Additional Precautionary Statements)

**PELIGRO** PRECAUTION AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

STOP - READ THE LABEL BEFORE USE

NET CONTENTS GALLONS

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

EPA Reg. No. 3125-173-AA EPA Est. 3125-MO-1

INERT INGREDIENTS: .....

0,0-Diethyl S-[2-(ethylthio)ethyl)

phosphorodithioate .....

ACTIVE INGREDIENT:

This container is dange ous if evidence of leakage is present. Read drum handling instructions and handle with extreme care, observing all precautions recommended.

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

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#### DRUM HANDLING

- 1. Handle drums of DI-SYSTON carefully so as to avoid damage and prevent leakage.
- 2. Store drums of DI-SYSTON in a cool, well-ventilated place.
- 3. Open drums of DI-SYSTON only when set on end and under a ventilated hood. Unscrew bungs slowly to release any internal pressure. Then fit both bungs with valves.
- 4. To empty drums of DI-SYSTON, connect one valve to an open vent pipe and the other to a closed storage or impregnation system.
- 5. Drums that have contained DI-SYSTON should NEVER be re-used. Refer to STORAGE AND DISPOSAL Statements on this label.

#### DIRECTIONS FOR USE

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

IMPORTANT: Read these entire Directions and Conditions of Sale before using DI-SYSTON Seed Treatment Insecticide.

CONDITIONS OF SALE: THE DIRECTIONS ON THIS LABEL WERE DETERMINED THROUGH RESEARCH TO BE THE DIRECTIONS FOR CORRECT USE OF THIS PRODUCT. THIS PRODUCT HAS BEEN TESTED FOR A RANGE OF WEATHER CONDITIONS SIMILAR TO THOSE WEATHER CONDITIONS THAT ARE ORDINARY AND CUSTOMARY IN THE GEOGRAPHIC AREA WHERE THE PRODUCT IS USED. INSUFFICIENT CONTROL OF PESTS AND/OR INJURY TO THE CROP TO WHICH THE PRODUCT IS APPLIED MAY RESULT FROM THE OCCURRENCE OF EXTRAORDINARY OR UNUSUAL WEATHER, OR FROM FAILURE TO FOLLOW LABEL DIRECTIONS. IN ADDITION, FAILURE TO FOLLOW LABEL DIRECTIONS MAY CAUSE INJURY TO OTHER CROPS, ANIMALS, MAN, OR THE ENVIRONMENT. MOBAY OFFERS, AND THE BUYER ACCEPTS AND USES, THIS PRODUCT SUBJECT TO THE CONDITIONS THAT EXTRAORDINARY OR UNUSUAL WEATHER, OR FAILURE TO FOLLOW LABEL DIRECTIONS ARE BEYOND THE CONTROL OF MOBAY AND ARE, THEREFORE, THE RESPONSIBILITY OF THE BUYER.

### ED TREATMENT:

DI-SYSTON Seed Treatment Insecticide properly applied to cottonseed gives effective early season control of aphids and thrips attacking cotton. The product is ready to use as it comes from the container and should be applied with seed treating equipment capable of distributing the chemical evenly on the seed. It is recommended that DI-SYSTON Seed Treatment Insecticide be applied only to good quality cottonseed.

Cottonseed treated with DI-SYSTON also provides for the reduction of mites on cotton during the critical period from emergence to about the four to six-leaf stage. Should insect or mile populations build-up after this time, apply recommended quantities of DI-SYSTON 15% Granular or DI-SYSTON 8 as a side-dress application.

#### RECOMMENDED APPLICATIONS

CRO?	INSECTS	DOSAGE	REMARKS		
Cotton	Aphids Tirios	3.5 to 7 fluid ounces* per 100 lbs. of seed	Apply uniformly to cover all seeds.		
	Mites	7 fluid ounces* per 100 lbs. of seed			

\*Equivalent to 4 to 8 ounces DI-SYSTON active ingredient per 100 lbs. of seed.

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#### RESTRICTIONS

If the low rate (3.5 fluid ounces) is used, insect control may be impaired if treated seed is carried-over to the next growing season. Repeat treatment at the low rate the following season to insure maximum insect control.

Under adverse conditions, such as extremely cool or wet or extremely dry weather, DI-SYSTON may cause some delay in emergence, stunting of seedlings, or reduction of stand. Such damage may be more pronounced in light, sandy soils. Plant injury may also occur or may be enhanced when certain pre-emergent herbicides are used in conjunction with DI-SYSTON.

COTTONSEED TREATED WITH DI-SYSTON MUST BE PROPERLY LABELED. THIS IS THE REPONSIBILITY OF THE SEED TREATER. FOR GUIDANCE SEE SPECIMEN SEED LABEL. TREATED SEED SHOULD BE PACKAGED IN CONTAINERS THAT WILL PROTECT THE HANDLER FROM DI-SYSTON INSECTICIDE.

#### PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER POISON

POISONOUS BY SKIN CONTACT OR IF INHALED OR SWALLOWED. RAPIDLY ABSORBED THROUGH THE SKIN. REPEATED EXPOSURE MAY, WITHOUT SYMPTOMS, BE INCREASINGLY HAZARDOUS.

Do not breathe fumes. Wear a pesticide 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.

Do not get in eyes or on skin. Wear clean, heavy, natural rubber gloves and clean waterproof, or freshly laundered protective clothing (coveralls, rubber boots, cap, etc.). Destroy and replace gloves frequently. Bathe immediately after work and change all clothing.

HANDLING OF CONTAMINATED ARTICLES: Clothing and rags receiving undiluted DI-SYSTON Seed Treatment Insecticide as a result of leaks, spills, or mishaps should be removed immediately and not reused. These contaminated articles should be disposed of in the same manner as the empty container; see STORAGE AND DISPOSAL section for directions. (Contaminated articles which should be discarded would include: hats, gloves, aprons, coats, boots, etc. not made of rubber or coated with rubber or other similar raterials). Protective clothing and equipment should be washed down with detergent or soap and black in water. Wash water from the cleaning of protective clothing or equipment should not be allowed to run off or otherwise enter water supplies.

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#### PRECAUTIONARY STATEMENTS (Continued)

In case of poisoning call a physician or Poison Control Center immediately. Have patient lie down and keep quiet.

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

#### 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. Protessional medical assistance should be secured immediately. If on skin, remove contaminated clothing and wash skin immediately with soap and warm water. If eyes are contaminated, wash with flowing water for at least 15 minutes. If inhaled, remove victim to fresh air. If not breathing give artifical aspiration, preferably mouth to mouth.

#### TO PHYSICIAN:

ANTIDOTE - Administer atropine sulfate in large therapeutic doses. Repeat as necessary to the point of tolerance. 2-PAM is also antidotal and may be administered in conjunction with atropine.

Compound inhibits cholinesterase resulting in stimulation of the central nervous symmetric nervous system, and the somatic motor nerves. Do not give morphine. Watch for pulmonary edema, which may develop in serious cases of poisoning even after 12 hours. At first sign of pulmonary edema, the patient should be placed in an oxygen tent and treated symptomatically.

#### ENVIRONMENTAL HAZARDS

Treated seeds exposed on soil surface will be hazardous to birds and wildlife. To protect fish and to avoid contamination of domestic waters, do not dispose of any of this iterial in or near any body of water. Apply this product only as specified on the label.

#### STORAGE AND DISPOSAL

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

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, 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.

#### STORAGE AND DISPOSAL (Continued)

Container Disposal: Drums that have contained DI-SYSTON should NEVER be reused. Empty drums should be decontaminated by washing with hot, 5% caustic soda solution. They should then be perforated to prevent further use and disposed of in a sanitary landfill, or by other procedures approved by state and local authorities.

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 container is leaking invert to prevent leakage. If the container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides above. Wash area with strong lye solution. 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 Chemtrec at 800-424-9300.

MI-SYSTON is a Reg. TM of the Parent Company of Farbenfabriken Bayer GubH, Leverkusen.

#### SPECIMEN LABEL

### FOR USE ON CONTAINERS OF COTTONSEED TREATED WITH DI-SYSTON AT A RATE OF 8 OUNCES ACTIVE INGREDIENT PER 100 POUNDS OF SEED

COTTONSEED TREATED WITH 0,0-DIETHYL S-[2-(ETHYLTHIO)ETHYL] PHOSPHORODITHIOATE (at least 10 point type)

POISON

(at least 18 point type)

NOT FOR HUMAN OR ANIMAL CONSUMPTION NOR FOR USE IN PROCESSING FOR FEED AND OIL.

COTTONSEED TREATED WITH BDI-SYSTON.

(10 point type)

Cottonseed treated with DI-SYSTON gives effective control of aphids and thrips on cotton during the critical period from emergence to about the four to six-leaf stage. It will also provide for the reduction of mite populations that may be present during this critical period. Should infestations build-up after this time, apply recommended quantities of DI-SYSTON 15% Granular or DI-SYSTON 8 as a side-dress application.

#### PLANTING DIRECTIONS

This seed has been treated at the rate of 8 ounces of DI-SYSTON active ingredient per 100 pounds of seed. Treated seed should be planted at the normal recommended rate.

Keep out of Reach children WARNING. Danger

This treated seed is poisonous if swallowed. The treatment chemical, DI-SYSTON, is poisonous if inhaled or absorbed through the skin. Do not breathe dust from treated seed or get in eyes or on skin. Wash thoroughly with soap and warm water after handling treated seed. Wash contaminated clothing with soap and hot water before reuse.

Do not contaminate feed or foodstuffs. Keep out of reach of children. Load seeder out-doors. Promptly burn or bury empty containers. Stay out of smoke when burning containers.

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

If poisoning occurs, obtain prompt medical aid. Prolonged exposure may result in cholinesterase depression. Atropine sulfate is antidotal.

Treated seeds exposed on soil surface will be hazardous to birds and wildlife.

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

NET CONTENTS \_\_\_\_\_ POUNDS

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#### SPECIMEN LABEL

#### FOR USE ON CONTAINERS OF COTTONSEED TREATED WITH DI-SYSTON AT A RATE OF 4 OUNCES ACTIVE INGREDIENT PER 100 POUNDS OF SEED

COTTONSEED TREATED WITH 0,0-DIETHYL S-[2-(ETHYLTHIO)ETHYL] PHOSPHORODITHIOATE (at least 10 point type)

(at least 18 point type)

NOT FOR HUMAN OR ANIMAL CONSUMPTION NOR FOR USE IN PROCESSING FOR FEED AND OIL.

COTTONSEED TREATED WITH PDI-SYSTON.

(10 point type)

Cottonseed treated with DI-SYSTON gives effective control of aphids and thrips on cotton during the critical period from emergence to about the four to six-leaf stage. Should infestations build-up after this time, apply recommended quantities of DI-SYSTON 15% Granular or DI-SYSTON 8 as a side-dress application.

Insect control may be impaired if treated seed is carried-over to the next growing season. Repeat treatment at the same rate the following season to insure maximum insect control.

#### PLANTING DIRECTIONS

This seed has been treated at the rate of 4 ounces of DI-SYSTON active ingredient per 100 pounds of seed. Treated seed should be planted at the normal recommended rate.

KOOK.

WARNING Danger

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This treated seed is poisonous if swallowed. The treatment chemical, DI-SYSTON, is poisonous if inhaled or absorbed through the skin. Do not breathe dust from treated seed or get in eyes or on skin. Wash thoroughly with soap and warm water after handling treated seed. Wash 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.

Do not contaminate feed or foodstuffs. Keep out of reach of children. Load seeder outdoors. Promptly burn or bury empty containers. Stay out of smoke when burning containers.

If poisoning occurs, obtain prompt medical aid. Prolonged exposure may result in cholinesterase depression. Atropine sulfate is antidotal.

Treated seeds exposed on soil surface will be hazardous to birds and wildlife.

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

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