

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 16 1994

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Ms. Karen M. Pither
Miles Inc. P.O Box 4913
8400 Hawthorn Road
Knsas City, Mo 64120-0013

Dear Ms. Pither:

Skubject: Amendment - Label & Confidential Statement
of Formula (CSF)
DI-SYSTON Technical
EPA Registration No. 3125-183
Your Submission dated December 14, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. In reference to the revised CSF dated 12/7/93 for the basic formulation:

a. Based on the revised CSF, the nominal concentration of DI-SYSTON in your product would be 98.00% (985lb/1005.2lb) which does not agree with the label claim of 98.5%. Please revise your CSF so that the nominal concentration agrees with the label claim. The nominal concentration should be supported by the analysis of five batches of samples.

b. Upper certified limits should be specified for all the impurities listed under Column 14a.

2. In reference to the label:

a. In the ingredient statement, the total percentage should be expressed as 100.0% and be aligned according to decimal point with the other percentages.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch

CONCURRENT REGISTRATION DIVISION (7505C)

SYMBOL							
SURNAME	MOATS						
DATE	5/11/94						

DI-SYSTON TECHNICAL Insecticide

183-8048.YLD

U.S. LABEL

Base Pre-Reg. (8048)

295

Reason to Issue: Revise active ingredient concentration according to CSF dated 12/7/93.

Date of Draft: 12/14/93(Pre-Reg)(P)
Supersedes Draft Dated: 3/03/93

DI-SYSTON TECHNICAL

Insecticide

**AN INSECTICIDE FOR FORMULATING USE
FOR USE ONLY BY APPROVED FORMULATORS**

ACTIVE INGREDIENT:

Disulfoton, <i>O,O</i> -Diethyl S-[2-(ethylthio)ethyl]phosphorodithioate	98.5%
INERT INGREDIENTS:	1.5%
	100%

Atropine sulfate is antidotal. Consult physician for emergency supply.

EPA Reg. No. 3125-183
EPA Est. 3125-MO-1

Net Contents: ___ Pounds

STOP - READ THE LABEL BEFORE USE

KEEP OUT OF REACH OF CHILDREN

DANGER



POISON

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

This container is dangerous if evidence of leakage is present. Read Precautionary and Storage and Disposal Statements and handle with extreme care, observing all precautions recommended.

PELIGRO

PRECAUCION 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.)

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 16 1994

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

3125-183

MILES

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER****POISON**

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

Do not breathe fumes. Wear a mask or respirator effective for protection against DI-SYSTON which is 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 II.

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.) Wear goggles or face shield. Destroy and replace gloves frequently. Bathe immediately after work and change all clothing. Wash clothing thoroughly with soap and hot water before reuse.

In case of contact, immediately remove contaminated clothing and wash thoroughly with soap and warm water.

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

HANDLING OF CONTAMINATED ARTICLES: Clothing and rags receiving undiluted DI-SYSTON Technical 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 Container 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 material). Protective clothing and equipment should be washed down with detergent or soap and bleach in water. Wash water from the cleaning of protective clothing, or equipment should not be allowed to runoff or otherwise enter water supplies.

STATEMENTS OF PRACTICAL TREATMENT

In case of poisoning call a physician immediately. Have patient lie down and keep quiet. 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 on skin, remove contaminated clothing and wash skin immediately with soap and water. Get medical attention immediately. If in eyes, wash with plenty of flowing water. Get medical attention immediately. If inhaled, remove victim to fresh air. Apply artificial respiration if necessary. Get medical attention immediately.

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 system, the parasympathetic 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

This product 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.

BEST AVAILABLE COPY

DIRECTIONS FOR USE**DRUM HANDLING**

1. Handle drums carefully so as to avoid damage and prevent leakage.
2. Store drums in a cool, well-ventilated place.
3. Open drums 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, 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 Technical should NEVER be reused. Refer to STORAGE AND DISPOSAL STATEMENTS on this label.

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

Only for formulation into an insecticide, for (1) the following uses: Terrestrial, non-domestic, food uses on: Barley, beans (dry, snap, lima), bermudagrass [seed crop (24(C))], broccoli, Brussels sprouts, cabbage, cauliflower, coffee, corn, cotton, lettuce, peanuts, peas, pecans, peppers, potato, sorghum, soybeans, strawberries (propagating plants), tomatoes, and wheat.

Terrestrial, non-domestic, non-food uses on: Non-bearing fruit trees (apple, apricot, cherry, crabapple, peach, pear, plum and prune), raspberry (nursery stock), tobacco, and ornamentals (herbaceous plants, woody shrubs, trees).

Domestic outdoor uses 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).

- (2) uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) uses for experimental purposes that are in compliance with USEPA requirements.

MILES INC. DISCLAIMS ALL LIABILITY BASED ON BREACH OF WARRANTY, NEGLIGENCE, STRICT TORT LIABILITY, OR ANY OTHER THEORY OF LIABILITY FOR CROP DAMAGE OR FAILED EFFICACY RESULTING FROM THE USE OF THIS MILES INC. PRODUCT AS AN INGREDIENT IN ANY FORMULATION WITH A USE NOT SPECIFICALLY LISTED ON THIS LABEL.

Detailed formulating recommendations for DI-SYSTON Technical insecticide are contained in a manual available on request from Miles. Obtain and read this manual before undertaking the formulation of DI-SYSTON Technical to gain knowledge of physical and chemical properties, to avoid formulation hazards, and to assure a satisfactory finished product. This technical is recommended for impregnation of inert granules, dry fertilizer, etc. For specific information on federally registered uses for DI-SYSTON insecticide, contact Miles. Any variance from the federally registered labeling for products containing DI-SYSTON will have to be supported by data provided by the formulator.

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.

Container Disposal: Drums that have contained DI-SYSTON Technical 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 Miles Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Miles Kansas City Emergency Response Telephone No. is 816-242-2582, or contact Chemtrec at 800-424-9300.

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Miles Inc.
Crop Protection Products
Box 4913 Kansas City, MO 64120-0013