



004787-00010-060999

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Systems Integration Group, Inc.



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

JUN 9 1999

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dr. Don O'Shaughnessy
Director, Regulatory Affairs
Cheminova, Inc
1700 Route 23, Suite 210
Wayne, NJ 07470

Dear Dr. O'Shaughnessy:

Subject: Updated Precautionary Labeling and
Change in Label Ingredient Statement
Ethion Technical
EPA Reg. No. 4787-10
Chemistry Data Submitted November 23, 1998
Revised CSF Dated January, 1998
Revised Labeling Submitted February 4, 1999

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you:

Submit one copy of your final printed label incorporating the following correction before you release the product for shipment.

The front panel word, POISON must appear in red on a contrasting background.

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended label constitutes acceptance of this condition.

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

The submitted product chemistry data which were assigned EPA identification MRID nos. 44705601, 44705602, and 41706003; and your revised Confidential Statement of Formula (CSF) have been reviewed and found to be sufficient to support the requested change in the label ingredient statement. A copy of the product chemistry review is enclosed for your reference.

The revised CSF which was received with your application of February 4, 1999 is acceptable, provided you submit a copy of your corrected CSF, revised to reflect a total of 100%

for the values reported in column 13(b) for our files. Please refer to item three in the enclosed product chemistry review.

It is understood that the revised CSF dated January 1998 replaces all previously submitted CSF's for the subject product.

Please be advised that, to ensure proper review and processing of proposed CSF revisions as registration amendments, such requests must be formally submitted as a registration amendment (with the exception of those minor revisions falling within the scope of PR Notice 98-10, in which case they are submitted as a notification) to the Registration Division. A review of our registration file for the subject product reveals no record of the February 28, 1990 submittal of a revised CSF that was referenced in your subject letter.

As requested in your letter of February 4, 1999, enclosed is a copy of the Agency review of the acute toxicity studies which were submitted in 1986 for the subject product. A copy of our letter dated June 26, 1986 which was addressed to Trans Chemic Industries, the former registrant for the subject product is also attached. This letter provided the EPA identification numbers assigned to the studies and also transmitted the review of these studies. At that time, the EPA identification numbers assigned to submitted studies were called accession numbers. The accession numbers assigned to these data were 262027 and 262028. Please note that, according to the information in our data submitter files, the data formally designated as EPA accession numbers, 262027 and 262028 are now designated as MRID numbers 00157590 and 00157591.

The inhalation study referenced in the Ethion RED Toxicity Chapter (MRID number 00163159) was submitted by FMC in 1983 for their ethion technical product registered under EPA Reg. No. 279-2280. Any requests for a copy of the Agency review of the FMC data may be addressed to the Agency's Freedom of Information Officer, Jeralene Green (Mail Code, 1105) at 401 M Street, Washington, D. C. 20460.

Sincerely,

MAM

Marilyn A. Mautz
Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure

STOP! READ THE LABEL

POISON
See side panels
for antidote
and precautions



DANGER
Keep out of reach
of children

CAN KILL YOU

ACCEPTED
WITH COMMENTS
in EPA Label Draft

JUN 9 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
4787-10

AVISO!

AL USUARIO: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
(TO THE USER: if you cannot read English, do not use this product until the label has been fully explained to you.)

CHEMINOVA ETHION TECHNICAL

FOR FORMULATION OF INSECTICIDES ONLY

EPA Reg. No.: 4787-10

ACTIVE INGREDIENTS:	Ethion (O,O,O',O-tetraethyl S, S'-methylene bisphosphorodithioate)	96.4%
INERT INGREDIENTS:	3.6%
	TOTAL	100.0%

NET CONTENT: 53 US GALLONS 6 PINTS
(Net Weight: 250 kilograms or 550 pounds)

For Emergency Medical Information, call 1-800-228-5635, Ext. #153.

PRODUCT OF DENMARK
MANUFACTURED BY

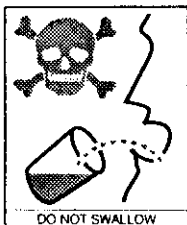
CHEMINOVA - LEMVIG - DENMARK

PHONE: (+45) 97 83 41 00 . TELEX: 66514 . TELEFAX: (+45) 97 83 45 55

EPA Est. No.: 4787-DN-1

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

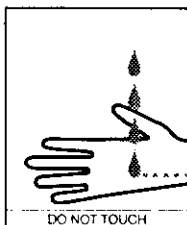


FATAL (POISONOUS) IF SWALLOWED

This product can kill you if swallowed even in small amounts.

MAY BE FATAL BY SKIN CONTACT

This product may be fatal if touched by hands or spilled or splashed on skin, in eyes or on clothing (liquid goes through clothes).



MAY BE FATAL IF BREATHED

This product may be fatal if vapors or mist are inhaled.

PROTECTIVE CLOTHING

This product may be fatal if swallowed, inhaled, or if allowed to contact skin. Failure to properly follow all instructions for protective clothing and equipment will increase your risk.

Use only when wearing the following protective clothing and equipment:

- (1) Waterproof pants, coat, hat, rubber boots or rubber overshoes.
- (2) Safety goggles.
- (3) NIOSH approved respirator.
- (4) Heavy duty, natural rubber gloves.



WORK SAFETY RULES

REPEATED EXPOSURES TO CHOLINESTERASE INHIBITORS SUCH AS ARE CONTAINED IN THIS PRODUCT MAY, WITHOUT WARNING, CAUSE PROLONGED SUSCEPTIBILITY TO VERY SMALL DOSES OF ANY CHOLINESTERASE INHIBITOR.

Persons working with this product should have frequent blood tests of their cholinesterase levels. If the cholinesterase level falls below a critical point, no further exposure should be allowed until it has been determined by means of blood tests that the cholinesterase level has returned to normal. Before using this product, consult the State Agricultural Extension Service or Experimental Station for specific recommendations regarding such blood tests.

Keep all unprotected persons and children away from working area.

Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help right away. Call a doctor (physician), clinic or hospital - immediately. Explain that the victim has been exposed to Ethion and describe his condition. After first aid is given (see Statement of Practical Treatment) and if a doctor cannot come, take victim to clinic or hospital.

If handled indoors, provide mechanical exhaust ventilation.

IMPORTANT! Before removing gloves, wash them with soap and water. Always wash hands, face and arms with soap and water before smoking, eating or drinking.

AFTER WORK, take off all work clothes and shoes. Shower, using soap and water. Wear only clean clothes when leaving job. Do not wear contaminated clothing. Wash protective clothing and protective equipment with soap and water after each use. Respirator should be cleaned and filter replaced according to instructions included with respirator.

(continued on other side)

POISON SIGNS (Symptoms)

Ethion is a very dangerous poison. It rapidly enters the body on contact with all skin surfaces and eyes. Clothing wet with material must be removed immediately. Exposed persons must receive prompt medical treatment or they may die.

Some of the signs and symptoms of poisoning are: Headaches, nausea, vomiting, cramps, weakness, blurred vision, pin-point pupils, tightness in chest, labored breathing, nervousness, sweating, watering of eyes, drooling or frothing of mouth and nose, muscle spasms and coma.

+ STATEMENT OF PRACTICAL TREATMENT +

Call a doctor (physician), clinic or hospital immediately. Explain that the victim has been exposed to Ethion and describe his condition.

Move patient immediately from the area where Ethion is present.

If breathing has stopped, start artificial respiration immediately and maintain until doctor sees victim.

If swallowed and victim is awake (conscious) make him vomit quickly. Have victim drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit is clear. Do not induce vomiting or give anything by mouth to an unconscious person. Have victim lie down and keep quiet. Get medical attention.

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Wash skin with plenty of soap and water while removing contaminated clothing and shoes. Get medical attention.

NOTE TO PHYSICIAN

Antidote: Administer atropine sulfate in large doses, TWO to FOUR mg. intravenously or intramuscularly as soon as cyanosis is overcome. Repeat at 5 to 10 minute intervals until signs of atropinization appear. 2-PAM chloride is a pharmacologic antidote and may be administered as an adjunct to, but not a substitute for, atropine which is a symptomatic and often lifesaving antidote. DO NOT GIVE MORPHINE OR TRANQUILIZERS. Ethion is a strong cholinesterase inhibitor affecting the central and peripheral nervous systems and producing cardiac and respiratory depression. At first sign of pulmonary edema, the patient should be given supplemental oxygen and treated symptomatically. Continued absorption of the poison may occur and fatal relapses have been reported after initial improvement; VERY CLOSE SUPERVISION OF THE PATIENT IS INDICATED FOR AT LEAST 48 HOURS.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to aquatic invertebrates. Do not discharge effluent containing this product 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 Environmental Protection Agency.

STORAGE AND DISPOSAL

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

Storage: Store in a secure, cool, dry place and keep container tightly closed. Ethion is stable for a long period when stored under temperatures not exceeding 25°C (77°F). It should never be heated above 55°C (131°F) and also local heating above this temperature should be avoided.

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.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

DIRECTIONS FOR USE

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

FOR MANUFACTURING OF INSECTICIDES ONLY FOR

1. THE FOLLOWING USE:

TERRESTRIAL, NON-DOMESTIC, FOOD USES ON: Citrus in Florida and Texas.

2. USES FOR WHICH US EPA HAS ACCEPTED THE REQUIRED DATA AND/OR CITATIONS OF DATA THAT THE FORMULATOR HAS SUBMITTED IN SUPPORT OF REGISTRATION.

3. USES FOR EXPERIMENTAL PURPOSES THAT ARE IN COMPLIANCE WITH US EPA REQUIREMENTS.

NOTICE

Seller's guarantee shall be limited to the terms set out on the label and subject thereto, the buyer assumes the risk to persons or property arising from the use or handling of this product and accepts the product on that condition.

PROPER SHIPPING NAME:

UN 3017, ORGANOPHOSPHORUS PESTICIDE, LIQUID, TOXIC, FLAMMABLE (Ethion), CLASS 6.1, P.G. II, MARINE POLLUTANT, (RQ)