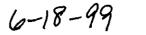


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Systems Integration Group, Inc.







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

JUN 18 1999

Sharon M. Johnston AgrEvo Environmental Health 95 Chestnut Ridge Road Montvale, NJ 07645

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Subject:

P-D 5 Residual Insecticide Intermediate

EPA Reg. # 4816-447

label amendment submitted 11/26/97

accepted with comments

Dear Ms. Johnston:

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 following comments:

1) The following sentence must be added to the section that begins "This product" may NOT be used for" Place this sentence at the end of the section after the list of sites.

"All manufacturing-use products produced from this product must bear a statement prohibiting formulation of such products for the uses identified above."

2) Correct typographical error at end of site list. Term is "Paint additives."

Please submit three (3) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of your label stamped "accepted with comments" is enclosed for your records.

Sincerely yours,

Thomas C. Harris

Insecticide / Rodenticide Branch

Registration Division (7505C)

Office of Pesticide Programs

enclosure



P - D 5 RESIDUAL INSECTICIDE INTERMEDIATE

- * FOR FORMULATION OF INSECTICIDES ONLY
- * A COMBINATION OF PYRENONE® INSECTICIDE AND DURSBAN INSECTICIDE

ACTIVE INGREDIENTS:

Pyrethrins	0.52%
 Piperonyl Butoxide technical 	
Chlorpyrifos [O,O-diethyl O-(3,5,6	
2-pyridyl) phosphorothioate	
HINERT INGREDIENTS	91.88%
	100.00%

 Equivalent to 2.08% (butylcarbityl) (6-propylpiperonyl) ether and 0.52% of related compounds.

†Contains Petroleum Distillate

Dursban - Trademark of DowElanco, U.S. patent No. 3,244,586 Pyrenone - Registered Trademark of AgrEvo Environmental Health, Inc.

EPA REG. NO. 4816-447

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Court of Court immediately. Do not induce vomiting. The problem of the sental spetroleum distillate. Aspiration may be a hazy of.

IF INHALED: Remove affect of person to fresh air. Apply artificial respiration if indicate affect of affective and affective affects of the person of the pe

IF IN EYES: flush east with centry of water. Get medical attention if irreless per ests.

IF ON SKIN: Wash affected areas with plenty of soap and water. Get medical attention if irritation persists.

See Side Panel for Additional Precautionary Statements

ACCEPTED with COMMENTS In EPA Letter Dated:

NET CONTENTS:

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

CODE 97000

PRECAUTIONARY STATEMENTS Hazards To Humans & Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing vapors. Do not get in eyes, on skin or on clothing. In case of contact, wash immediately with soap and water. Wash thoroughly after handling. Wash contaminated clothing before reuse. Do not contaminate feed, foodstuffs, or domestic water supplies.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote.

Environmental Hazards

This product is toxic to fish, birds and other wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permiting authority has been notified in writing prior to discharge. In not discharge effluent containing this product of tew of stellar without previously notifying the local sews let at must plan authority. For guidance, contact your state Wall and are kegional Office of the EPA. Do not contain the wall by cleaning of equipment or disposal of wates.

NRECTIONS FOR USE

is violation of ederal law to use this product in a manner it consists that with its labeling. This product is intended for formulation use only. The formulator using this concentrate is fully responsible for obtaining EPA registration for his formulated products.

INSERT Attachment A

Only For Formulation Into An Insecticide For (1) The Following Uses: Terrestrial Food/Feed and Non-Food Crops, Aquatic Non-Food, Greenhouse Ornamentals, Domestic Indoor and Outdoor, Indoor Food (food handling establishments - edible product areas), Indoor Non-Food, Commercial, Institutional, Industrial Uses, Treatments to Livestock; (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; and, (3) Uses for experimental purposes that are in compliance with US EPA equirements.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage And Spill Procedures:** Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or ricse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

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

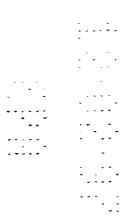
WARRANTY STATEMENT

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibilities, including injury

P-D 5 RESIDUAL®

or damage, resulting from its misuse as such, or in combination with other materials.

AgrEvo Environmental Health 95 Chestnut Ridge Road Montvale, NJ 07645



ATTACHMENT A

This product may be used ONLY for formulation into an insecticide for the following uses:

Agricultural Crops (Terrestrial Food Crop) (Greenhouse Food Crop): Alfalfa, apple, asparagus, banana, bean (snap, lima), beet (sugar, table, including seed), blueberry, brassica (cole) leafy vegetables (bok choy, broccoli, broccoli raab, broccoli, Brussels sprout, cabbage, Chinese cabbage, cauliflower, collard, kale, kohlrabi), cane berry, cherimoya, cherry (sour, sweet), citrus (lemon, orange, grapefruit and citrus, other) citrus orchard floor, corn (field, sweet, seed), cotton, cranberry, cucumber, date feijoa, fig, grape, kiwifruit, leek, legume vegetables, mint, nectarine, onion (dry bulb), pea, peach, peanut, pear, pepper, plum, prune, pumpkin, radish (including seed), rutabaga, sapote, seed and pod vegetables, sorghum (grain, milo), soybean, strawberry, sugarcane, sunflower, sweet potato, tobacco, tomato (except cherry tomato), tree nuts (almond, filbert, pecan, walnut, other), turnip, wheat, and seed treatment.

Ornamentals (Outdoor and Nursery) (Terrestrial Nonfood Crop) (Greenhouse Non-food Crop) (Indoor): Outdoor and field grown ornamentals (including, but not limited to flowers, shrubs, evergreens, vines, shade and flowering trees, and non-bearing fruit, nut, and citrus trees); perennial grass seed crops, potted, containerized or balled and burlapped nursery stock plants; annual and perennial plants; houseplants.

Tree and Forest Pests (Forestry) (Domestic Outdoor): Nurseries, plantations, felled trees, shade and flowering trees and Christmas tree plantations; cut stumps.

Turf and Other Outdoor Areas (Domestic Outdoor) (Terrestrial Nonfood Crop): Including, but not limited to golf courses, lawns and other ornamental and recreational turfgrass areas and non-crop areas such as roadsides, footpaths and trails, picnic and camping sites, parks and other recreational areas, sod farms and commercial turfgrass areas, and ant mounds.

Pest Control on Outside Surfaces and Around Buildings (Domestic Outdoor): Perimeter Treatments (applied to and around outside surfaces of residential and non-residential buildings and structures, including, but not limited to) crawl spaces, decks, driveways, eaves, fences, foundations, garages, patios, refuse dumps, walkways, walls, window and door frames, wide area and general outdoor treatment (for flying insects), baits and soil treatments.

Wood or Wood Structure Protection Treatments (Domestic Indoor or Outdoor): General surface, localized injection and barrier soil treatments to residential and non-residential buildings and structures including but not limited to pre and post construction termiticide barrier soil application, wood surfaces, voids and channels in damaged wood, gaps between wooden members, wall voids, junctions between wood and foundation; underground utility cables and conduits; fence posts and utility poles; and wood treatment (dip, spray, or pressure treatment of lumber, logs, pallets, poles, posts, wooden containers and processed wood products).

Pest Control Indoors (Indoor): Crack and crevice, spot and bait treatments in and around residential and non-residential buildings and structures including food-handling establishments, including, but not limited to apartment buildings, bakeries, bottling facilities, breweries, cafeterias, food manufacturing plants, food processing plants, food service establishments, granaries and grain mills, hospitals hotels, houses (including crawl spaces), industrial buildings, kitchens, laboratories, mausoleums, mobile and motor homes, offices, restaurants, schools, stores, warehouses, wineries, and vehicles

Pets and Domestic Animals (Indoor): Pet collars, cattle ear tags, animal housing including but not limited to pet kennels, poultry houses, and livestock housing (corrals, stockyards, holding pens and other outdoor livestock holding areas).

This product may NOT be used for formulation into manufacturing-use or end-use products for the following uses:

Pest Control Indoors (Indoor): Indoor broadcast use; total release foggers for indoor residential and non-residential (except greenhouse) use; coating products intended for large indoor surface areas such as floors, walls, and ceilings inside residential dwellings, offices, schools, or health care institutions including, but not limited to, houses, apartments, nursing homes and patient rooms in hospitals.

Pets and Domestic Animals (Indoor): Animal dips, sprays, shampoos, dusts.

Aquatic Uses (Aquatic Food Crop) (Aquatic Non-Food): Any aquatic use, including mosquito larvicide.

Pest Control Indoors or Outdoors (Domestic Indoor or Outdoor): Pain additives; application in sewer manholes