



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

MAR 27 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject: Pyrenone Dursban Aqueous Base, EPA # 4816-622

5 Acute Product Toxicity Studies submitted 11/11/97	acceptable
revised basic CSF submitted 11/11/97	acceptable
label amendment submitted 11/11/97	accepted with comments

Dear Ms. Johnston:

This letter will address the status of all three submissions listed above.

Acute Product Toxicity Studies

The five acute product toxicity studies submitted by you on 11/11/97 in anticipation of product reregistration have been reviewed since the primary eye irritation study was also submitted under FIFRA 6(a)(2). All five studies were found to be acceptable. A copy of the EPA review dated 3/23/98 is enclosed (attachment 1).



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contains at least 50% recycled fiber

The acute toxicology profile is now as follows:

acute oral toxicity	III	acceptable
acute dermal toxicity	IV	acceptable
acute inhalation	?	supplementary
primary eye irritation	I	acceptable
primary skin irritation	IV	acceptable
dermal sensitization	non-sensitizer	acceptable

Note that there is still an outstanding acute product toxicity study on this product (acute inhalation). The original product toxicity studies were submitted on 9/9/83. A copy of EPA's review dated 11/30/83 (attachment 2) is enclosed along with a copy of EPA's letter dated 12/22/83 advising the registrant of this situation (attachment 3). Until this data gap is filled a category III has been assumed for the acute inhalation.

Revised basic Confidential Statement of Formula (CSF)

The Agency has reviewed your submission for a revised Confidential Statement of Formula (CSF). The CSF dated 11/11/97 for the basic formulation is acceptable. Revised ingredients were found to be similar to previous ingredients. The ingredient percentages and limits comply with PR Notice 91-2.

The CSF has been added to your file as part of the record. It replace all previous versions.

11/11/98 label amendment based on new acute toxicity studies

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:

Label item	Comment
Statement of Practical Treatment	EPA is now encouraging use of the simple phrase "FIRST AID" instead of "statement of practical treatment". Optional.

Label item	Comment
Statement of Practical Treatment	<p>The "if swallowed" text is not quite correct. Replace this section with the following text:</p> <p>"If Swallowed: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."</p>
Statement of Practical Treatment	<p>There should be a "NOTE TO PHYSICIAN" section after the "FIRST AID" section.</p> <p>The following text must be included due to the eye irritation category I: "Probably mucosal damage may contraindicate the use of gastric lavage."</p> <p>In addition, the note should include the following (exact wording your choice):</p> <ul style="list-style-type: none"> - technical information on symptomatology; - use of supportive treatments to maintain life functions; - medicine that will counteract the specific physiological effects of the pesticide; - company telephone number to specific medical personnel who can provide specialized medical advice. <p>Due to the chlorpyrifos you should mention cholinesterase inhibition with atropine and/or 2-PAM as antidotes.</p>
Precautionary Statements	<p>Add the following section under the "Precautionary Statements" header. Format would be same as "Environmental Hazards" section.</p> <p>"Physical & Chemical Hazards Do not use or store near heat or open flame."</p>

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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 (attachment 4).

Sincerely yours,



Thomas C. Harris
Biologist
Insecticide Rodenticide Branch
Registration Division (7505C)

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PYRENONE® DURSBAN® Aqueous Base

FOR FORMULATION INTO INSECTICIDES ONLY

ACTIVE INGREDIENTS:

Pyrethrins	0.52%
*Piperonyl Butoxide, Technical	2.60%
Chlorpyrifos	5.00%

INERT INGREDIENTS: 91.88%
100.00%

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

Pyrenone is a registered trademark of AgrEvo Environmental Health, Inc.

Dursban is a registered trademark of DowElanco.

EPA Reg. No.: 4816-622

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN DANGER

STATEMENT OF PRACTICAL TREATMENT

If In Eyes: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

If Swallowed: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly, a large quantity of milk, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

See Side Panel for Additional Precautions

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NET CONTENTS:

PRECAUTIONARY STATEMENTS Hazards To Humans & Domestic Animals DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). Harmful if swallowed or inhaled. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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 permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

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

Formulator is responsible for obtaining EPA registration of his formulated product(s).

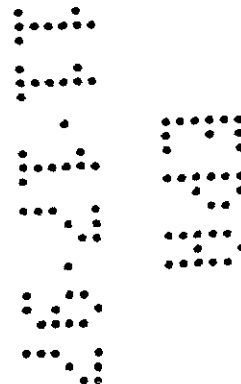
Only for formulation into an insecticide for:
Terrestrial Food/Feed and Non-Food Crops,
Greenhouse (ornamentals), Indoor Food and Non-Food Sites, Treatments to Livestock and Premises, Commercial Industrial Uses, Domestic Outdoor (household).

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAR 27 1998

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

4816-622



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

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