X1414 (181-411

A Company of the states

İ

1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON D.C. 1 Jun 2 7 1994

Beilycleid Persyllahie

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

5-(157743 336

CERTIFIED MAIL

Amvac Chemical Corp. 4100 E. Washington Blvd. Los Angeles, CA 90023

Actention: Ms. Jeannie Smith

Subject · Phosdrin Insecticide / EPA Reg. No. 5481-411 Mevinphos Insecticide Technical EPA Reg. No. 5481-425 Your applications received December 20, 1993

We have completed our review of the above applications to consolidate labeling changes needed to delete unsupported uses for reregistration, to comply with Worker Protection Standard (WPS) requirements, and to effect other changes.

The Confidential Statements — Formula (CSF), submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable. Copies of the CSF (1000 d December 13, 1993), have been placed in our files for the subject products.

The labeling referred to alcos, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes to both products:

1. Before "PEAS", put "SUCCULENT".

If these conditions 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.

Although we have accepted the requested changes, the Agency is still examining its substant of concerns about the risks posed by the continued use of Mevinphes products. You should not interpret these label acceptances by the Registration Division as a conclusion by the Agency that the products do not cause unreasonable adverse effects on the avironment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours, TAF

Robert A. Forrest Product Manager (14) Insecticide-Rodenticide Branch Registration Division (H7504C) 121

Enclosures: 1. Stamped Label (EPA Reg. No. 5481-411) 2. Stamped Label (EPA Reg. No. 5481-425) 3. A-79 Enclosure

Peacock WP#5:A:5481-411.:305-5407,-6600:6/24/94

------

1

NEW DRAFT LABEL - PADDOSEd

1

١

)

FRONT PANEL (Page 1)

•

# PHOSDRIN INSECTICIDE

This Pesticide May Only Be Used in the Formulation of an Insecticide with the Use Patterns as Specified on the Right Panel of this Label. Formulators are Responsible to Obtaining and Maintaining EPA Registrations on their MEVINPHOS Formulated Products.

ACTIVE INGREDIENTS: Mevinphos (2-Carbomethoxy-1-methylvinyl dimethyl phosphate, alpha isomer) : 63.0% Mevinphos (2-Carbomethoxy-1-methylvinyl dimethyl phosphate, beta isomer) : 25.0% INERT INGREDIENTS: : 12.0% TOTAL 100.0%

The decrease in the percentage of total Mevinphos Active Ingredient from 100% to 88.0% (63.0% alpha isomer and 25.0% beta isomer) does not represent a reduction in strength of product, but is a redesignation of the manufacturing impurities from Active Ingredient (under Related Compounds) to Inert Ingredients.

# **KEEP OUT OF REACH OF CHILDREN**

DANGER-POISON

# PELIGRO

ACCEPTED with COMMENTS in EPA Lotter Dated JUN 2 7 1994

Under the Federal Inscritche, Fungicide, and Rodenticide Act as amended for the positide registered a dec DPA lieg. No. 5481 - 4111

Si usted no entiende la etiqueta, busque a alguien para que se la explique a ustad en detalle. (If you do not understand this label, find someone to explain it to you in detai')

EPA Rag. No. 5481-411

١

#### FRONT PANEL (Page 2)

#### STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching back of throat with finger. Never induce vomiting or give anything by mouth to an unconscious or convulsing person. IF INHALED; Hemove victim to fresh air immediately. Apply artificial respiration if indicated. Get medical attention. IF IN EYES; Flush eyes with plenty of water for 10 minutes. Get medical attention immediately. IF ON SKIN; Remove contaminated clothing and immediately wash affected area with soap and water. Call a physician immediately. Wash clothing before reuse.

IF POISONING SYMPTOMS appear, (See Poisoning symptoms under NOTE TO PHYSICIAN), keep patient prone and quiet. Start artificial respiration immediately if patient is not breathing. Transport the patient immediately to the nearest hospital. See side panel for additional instructions.

SEE ANTIDOTE AND OTHER PRECAUTION STATEMENTS ON SIDE PANEL

#### **PRECAUTIONARY STATEMENTS**

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

DANGER: Fatal if swallowed, inhaled or absorbed through the skin. Rapidly absorbed through the skin. Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to MEVINPHOS Insecticide poisoning. Do not swallow or get in eyes, on skin or on clothing. Do not breathe vapors. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Keep away from heat or open flame. Wear protective clothing and rubber gloves. Remove contaminated clothing and wash before reuse. Do not contaminate food or feed products.

EPA REG. NJ. 5481-411

- }

)

EPA EST. NO. 5481-CA-1

. . .

#### NET CONTENTS 300 POUNDS

## AMVAC CHEMICAL CORPORATION 4100 EAST WASHINGTON BLVD, LOS ANGELES, CA 90023, USA

NEW DRAFT LADEL

ł

#### PERSONAL PROTECTIVE EQUIPMENT & WORK SAFETY STATEMENTS

USE ONLY WHEN WEARING THE FOLLOWING PERSONAL PROTECTIVE EQUIPMENT DURING MIXING/LOADING, REPAIR AND CLEANING OF MIX'NG/LOADING EQUIPMENT OR DISPOSAL OF PESTICIDE; Protective suit of one or two pieces that covers all parts of the body except head, hands, and feet; NICSH or MSHA approved respiratory protection device; chemical-resistant glovas; chemical-resistant shoes (or chemical-resistant shoe coverings or chemical-resistant boots): In addition, mixer/loaders must wear a chemical-resistant apron. During equipment repair and cleaning, the protective suit and the respirator need not be worn.

IMPORTAINT: If pesticide comes in contact with skin, wash off with soap and water and contact a physician immediately. Always wash hands, face, and arms with soap and water before smoking, eating, drinking, or toileting.

AFTER WORK: Before removing gloves, wash them with soap and water. Take off all work clothes and shoes. Shower using soap and water. Wear only clean clothes when leaving job - do not wear contaminated clothing. Personal and protective clothing worn during work must be laundered separately from household articles. Store protective clothing separately from personal clothing. Clean or launder protective clothing after each use. Protective clothing and equipment that becomes heavily contaminated or drenched with Mevinphos must be destroyed according to State and local regulations.

HEAVILY CONTAMINATED OR DRENCHED CLOTHING CANNOT BE ADEQUATELY DECONTAMINATED.

The National Pesticide Telecommunication Network is available for recommendations regarding poisoning management, emergency treatment, and other information regarding the toxicity of Mevinphos. The toll free number for the National Pesticide Telecommunication Network is 1-800-858-7378.

۱

ł

#### LEFT PANEL (Page 2)

#### NOTE TO PHYSICIAN - POISONING SYMPTOMS

Puisoning Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pin point pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps.

#### TREATMENT

Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulations, Atropine Sulfate should be injected at 10 minute intervals in doses of 1 to 2 milligrams until complete atropinization has occurred. Pralidoxime chloride (2-PAM chloride) may also be used as an affective antidote in addition to and while maintaining full atropinization. In adults, an initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion, in 250 cc of saline over a 15 to 20 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5% solution in water over not lass than 2 minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children, the dose of 2-PAM is 0.25 grams. Morphine is an improper treatment.

Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may, without warning, cause prolonged susceptibility to very small deses of any cholinesterase inhibitor. Allow no further exposure until time for cholinesterase regeneration has been attained as determined by a blood test.

For 24 hours emergency medical assistance call HIS at 1-800-228-5635 ext. 169

For 24 hour emergency transportation assistance call CHEMTREC at 1-800-424-9300 j

}

#### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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.

#### PHYSICAL & CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

#### **DIRECTIONS FOR USE**

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

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Do not reuse empty container. Open dumping is prohibited. DANGER; Wear a pesticide respirator and avoid forming dust clouds during cleanup. STORAGE; Do not store in or around the home. Store in a secure, dry, and temperate area. Store in original container only. If spilled, avoid exposure. If significant spill, call CHEMTREC (800) 424-9300 or (213) 264-3910. Spill can be contained by covering with a sufficient amount of absorbent material, such as clay, diatomaceous earth, sand, sawdust, or sweeping compound. Place in drum, label contents, & dispose of according to the instructions below in pesticide disposal. DISPOSAL: <u>PESTICIDE DISPOSAL</u>; 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 nearest State Pesticide or . Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA regional office for guidance. <u>CONTAINER DISPOSAL;</u> (Metal) Triple rinse (or equivalent) Then offer for recycling or reconditioning, or puncture & dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. (Plastic) Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

٠.

)

#### RIGHT PANEL (Page 2)

#### **USE PATTERNS FOR MEVINPHOS PRODUCTS**

This product may be used only for formulation into other registered manufacturing-use products or other registered end-use products with the following use patterns.

ORCHARD CROPS LEMONS.

#### SMALL FRUITS AND BERRIES

**GRAPES; STRAWBERRIES.** 

#### VEGETABLE CROPS

ARTICHOKES; BROCCOLI; CABBAGE; BRUSSELS SPROUTS; CAULIFLOWER; COLLARD3; KALE: CELERY; LETTUCE; MELONS (INCLUDING CANTALOUPES, HONEY-DEW MELONS, MUSKMELONS, WATERMELONS); MUSTARD GREENS; PARSLEY; PEAS (INCLUDING VINES); SPINACH. )

}

#### WARRANTY

By using this product, the user accepts the following:

LIMITED WARRANTY: AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on this label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions and other statements on this label are based upon reasonable experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops and upon reports of field experience. Testing has not been performed on all varieties of food crops and plants, in all States or under all application, weather and crop conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. AMVAC NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY WARRANTY, EXFRESS OR IMPLIED. AMVAC EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES\_OF\_MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER WARRANTY OF QUALITY OR PERFORMANCE.

THIS WARRANTY DOES NOT FXTEND TO, AND THE USER SHALL BE SOLELY RESPONSIBLE FOR. ANY LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THIS LABEL'S DIRECTIONS, WARNINGS OR CAUTIONS.

USER'S EXCLUSIVE REMEDY AND AMVAC'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY CLAIM, LOSS, DAMAGE OR INJURY RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, SHALL BE LIMITED TO, AT AMVAC'S OPTION, TO REPLACEMENT OF, OR REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL AMVAC OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT,

## AMVAC CHEMICAL CORPORATION 4100 East Washington Blvd, Los Angeles, CA 90023, USA