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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 24, 1997

H.R. McLane
7210 Red Road
Suite 206
Miami, F.L. 33143-5312

Dear Mr. McLane:

Subject: Amendment to the letter sent on October 20, 1997 that discussed the Confidential Statement of Formula and label for AMVAC Chemical Corporation's product Parathion E/M 6-3 (EPA Reg. No. 5481-437).

The Agency has again reviewed your submission of the Confidential Statement (CSF) of Formula dated April 16, 1997 for the Parathion E/M 6-3 (EPA Reg. No. 5481-437) formulation, and the following comments apply:

- 1) The % by weight should equal 100%. At this time it appears to equal 100.74. This is further discussed in item (4).
- 2) Amend the EPA registration number from "4787-3" to "4787-17" for the ethyl parathion technical in your product.
- 3) The CSF should state the % of active ingredient; the % of related compounds in both technicals.

For example, methyl parathion contains 77% active ingredient; 3% related compounds; and 20% inerts. If the product contains 36% methyl parathion (as stated in the CSF), then $36 \times .77 = 27.72\%$ of active ingredient. The related compounds would be $36 \times .03 = 1.08\%$, then the inerts in methyl parathion would be $36 \times .20 = 7.2\%$. The total of these, $27.72 + 1.08 + 7.2 = 36$.

The same should be specified for the ethyl parathion technical which contains 95% active ingredient, 3% related compounds and 2% inerts. If the product contains 58.37 of parathion technical (as stated in the CSF), then $58.37 \times .95 = 55.45\%$ of active ingredient. The related compounds would be $58.37 \times .03 = 1.75\%$, then the inerts in ethyl parathion would be $58.37 \times .02 = 1.17\%$. The total of these, $55.45 + 1.75 + 1.17 = 58.37$.

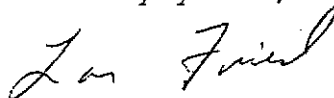
4) With the information derived from item (3) the label would appear as follows:

Ethyl Parathion	55.45%
Related comp....	1.75%
Methyl Parathion	27.72%
Related comp....	1.08%
Inerts	14.74%
	100.74%

However, the total exceeds 100%. I suggest that you make minor adjustments to the components in the formulation to arrive at 100%.

Please make the changes noted above to the label and CSF, then resubmit them as soon as possible. Once I've received your updated CSF and label I'll respond within a few days. I realize that you may have questions about the above information. I can be reached at (703) 308-6742.

Sincerely yours,



Lawrence Fried
Biologist
Insecticide-Rodenticide Branch
Registration Division (7505C)

RESTRICTED USE PESTICIDE

Due to very high acute toxicity to Humans and Birds For retail sale only to certified commercial aerial applicators or persons under their direct supervision. For use only by certified commercial aerial applicators. Direct supervision for this product is defined as the certified commercial applicator being physically present during mixing, loading, repair and cleaning of application equipment. Certified commercial aerial applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

PARATHION E/M 6-3

Organophosphorus Insecticide Emulsifiable Liquid

For use only on alfalfa, barley, corn, cotton, sorghum, soybeans, sunflower, and wheat.

ACTIVE INGREDIENTS:

Parathion: O,O-Diethyl O-p-Nitrophenyl Phosphorothioate.	57.2%
O,O-dimethyl O-p-nitrophenyl Phosphorothioate.	28.8%
INERT INGREDIENTS:	14.0%
Total	100.0%

*Methyl Parathion

Content Toxicants Per Gallon = 6 lbs. Parathion plus 3 lbs. Methyl Parathion

**KEEP OUT OF REACH OF CHILDREN
DANGER - POISON
PELIGRO - VENENO**

☠ CAN CAUSE DEATH ☠

"PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente"

STATEMENTS OF PRACTICAL TREATMENT

FIRST AID TREATMENT: Call a doctor (physician), clinic or hospital immediately. Explain that the victim has been exposed to Parathion 6-3 and describe his condition. **IF BREATHING HAS STOPPED:** Start artificial respiration immediately and maintain until doctor sees victim. **IF SWALLOWED:** Call a physician or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, or, if available, by administering syrup of ipecac. Do not induce vomiting or give anything by mouth to an unconscious person. **IN CASE OF CONTACT:** Immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. See doctor immediately.

See additional PRECAUTIONARY STATEMENTS on side panel.

PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER:**



CAN KILL YOU IF SWALLOWED: This product can kill you if swallowed even in small amounts; spray mist may be fatal if swallowed.



CAN KILL YOU BY SKIN CONTACT: This product can kill you if touched by hands or spilled or splashed on skin, in eyes or on clothing liquid goes through clothes).



CAN KILL YOU IF BREATHED: This product can kill you if vapors, or spray mist is breathed.

WORK SAFETY RULES

The National Pesticide Telecommunication Network is available for recommendations regarding poisoning management, emergency treatment, and other information regarding the toxicity of Parathion 6-3. The toll free number for the National Pesticide Telecommunication Network is 1-800-858-7378. If handled indoors, provide mechanical exhaust ventilation. Keep all unprotected persons, children, livestock, and pets away from treated area or where there is danger of drift. Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help right away. See First Aid (PRACTICAL TREATMENT) section.

IMPORTANT! 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. **AFTERWORK:** 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 the job. Do not wear contaminated clothing. Personal clothing worn during work must be stored and laundered separately from protective clothing and household articles. Store protective clothing separately from personal clothing. Clean or launder protective clothing after each use. Respirators must be cleaned and filters replaced according to instructions included with the respirators. Protective clothing and protective equipment heavily contaminated or drenched with parathion must be destroyed according to state and local regulations. Heavily contaminated or drenched clothing cannot be adequately decontaminated. During aerial application, human flaggers are prohibited.

POISON SIGNS (Symptoms)
Parathion 6-3 is a very dangerous poison. It rapidly enters the body on contact with all skin surfaces and eyes. Clothing wet with this 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: Headache, 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.

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 also antidotal and may be administered in conjunction with atropine. **DO NOT GIVE MORPHINE OR TRANQUILIZERS.** Parathion 6-3 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 fish, aquatic invertebrates, and wildlife. Birds in treated areas may be killed. Snrimp and other aquatic organisms may be killed at recommended application rates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas before the mean high water mark. Runoff and drift from target areas may be hazardous to aquatic organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters. This product is extremely toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weed if bees are visiting the treatment area.

PHYSICAL OR CHEMICAL HAZARDS

Do not use 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. Do not apply this product through any type of irrigation system.

SPECIAL INSTRUCTIONS FOR RESTRICTED USE PESTICIDE

RETAILERS: In addition to any other required records, restricted use pesticide retailers must record at the time of sale the unique container identification number on this label or container and the identity of the purchaser of the product.

REMOVAL OF PRODUCT FROM CONTAINER: This container is fitted with the MICRO MATIC™ liquid transfer valve system. To remove product, use the MICRO MATIC coupler attachment, which is available from the seller of this container. The directions below must be followed.

- To Connect Coupler:
1. Attach pump hose to chemical pump.
 2. Attach pump hose to coupler.
 3. With coupler handle in disengaged position, insert coupler straight down into the drum valve, ensuring that the pins on the Coupler align with the slots on the valve.
 4. Turn coupler handle clockwise a quarter turn, until it locks into place.
 5. Push down coupler handle to engage, ensuring that the lock bar clicks into place.

To Disconnect Coupler:

1. Press down on coupler and disconnect the lock bar. Allow coupler handle to raise to its disengaged position.
2. Turn Coupler handle counter clockwise a quarter turn. Lift coupler straight up.

If you have any questions or need assistance, please call your Distributor or 1-800-548-5113

REENTRY STATEMENT

General Reentry Limitation: While an area is being treated with this product and during the first three days after treatment (six days after treatment if the crop treated is corn) or any longer period of time prescribed by State law or regulation, no person may enter or remain in the treated area or within 100 feet of the treated area. **Exception:** After four (4) hours have passed since the end of the application, a person may enter an area under reentry restrictions to perform scouting or irrigation-related work in accordance with the following requirement: No person shall remain in any area under reentry restrictions for a total of more than 1 hour in any 24 hour period. Before entering the treated area, the person must have read the product labeling or have been informed, in a language that the person can understand, of all the requirements of the product's labeling related to human hazards or precautions, first aid, symptoms of poisoning, personal protective equipment specified for early entry, and any other labeling requirements related to safe use. The person must wear personal protective equipment consisting of a cotton or other fabric coverall worn over a long-sleeved shirt and long pants, chemical resistant boots, and chemical resistant gloves, and shall take appropriate measures to prevent heat-related illness.

The person must carry an eye-flush dispenser containing at least one pint of water. A reasonably accessible decontamination site must be available with adequate supplies of potable water for washing, soap, and single-use towels. After restricted reentry activity, the person must be provided soap, clean towels, and a sufficient amount of potable water for washing and must wash thoroughly after removing personal protective equipment. All personal protective equipment worn during restricted reentry must be laundered separately and may not be worn home. **Posting of Treated Areas:** Treated areas shall be posted with signs at all usual points of entry or in the corners of the treated areas affording maximum visibility. Written warnings must include the following information:

DANGER: Area treated with Parathion 6-3 on (date). Do not enter.

Consult your State Agricultural Extension Service or Experiment Station regarding posting treated areas.

LIMITS ON APPLICATION

Aerial Application Only: This product may be applied aerially, and only by a certified commercial applicator as defined in FIFRA § 2(e)(3). **Areas Where Application is Prohibited:** This product may not be applied within 100 feet of buildings, public roads or bodies of water. Parathion 6-3 may not be applied within 100 feet of property lines unless the owner of the adjacent property has given prior written consent to the application and has been informed of the timing of the application and the appropriate reentry requirements. **Drift Reduction Measures:** Do not apply this product if the wind exceeds 10 miles per hour. Apply only from nozzles located not more than 75% of the distance from the center of the aircraft to the wing tip or helicopter rotor tip. Notification to Land Owner: A certified commercial applicator shall not apply this product to a person's property unless the applicator has notified the person in writing no more than 12 months before the date of the application of the requirement that crops treated with Parathion 6-3 be harvested mechanically, the appropriate reentry interval and the requirements concerning reentry set forth on this label; and the incident reporting requirements set forth on this label.

PROTECTION OF APPLICATORS, MIXER LOADERS, AND MAINTENANCE PERSONNEL

Applicator Protection: The cockpit of the aircraft used to apply this product must be fully enclosed while the product is being applied. No pilot may apply this product if the pilot has earlier during the day of application performed any mixing/loading activities (other than acting as an observer) involving any pesticide product containing Parathion. **Maintenance/Personal Protection:** The following protective clothing and equipment must be worn during repair, cleaning of application equipment, and disposal of pesticide: waterproof-suit of one or two pieces covering all parts of the body except the head, hands, and feet, heavy-duty chemical resistant gloves; chemical resistant shoes (or chemical resistant shoe coverings of chemical resistant boots); goggles or face shield; hood or wide-brimmed hat; NIOSH approved respirator. **Mixer-loader Protection:** An observer must be present during all mixing/loading activities in order to furnish assistance in the event of an accident. The observer may not act as a mixer-loader. Any person involved in mixing/loading activities (other than the observer) must wear a cotton or other fabric coverall worn over a long-sleeved shirt and long pants, chemical resistant boots and gloves, and when the mixing/loading system is pressurized, a chemically resistant apron and a face shield or goggles.

INCIDENT REPORTING

A telephone notification must be made if mixing, loading, or use of a product containing parathion results in inadvertent or unexpected human exposure to the product or illness resulting from exposure to the product. If it is the product, its investigation by Federal, State or local authorities of allegations involving drift of the product, or the deaths of birds or other wildlife. The certified applicator or the owner of the treated land must notify by telephone the Chief Compliance Branch, Office of Compliance Monitoring, U.S. EPA, at 202-260-3375 within seven days of becoming aware of the incident.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL STORAGE: Store in a dry location away from children, animals, food, feeds, seeds, and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product. Handle in accordance with informa-

tion given under PRECAUTIONARY STATEMENTS. Do not store under conditions where temperature may exceed 100°F or below 45°F. Keep storage area locked when not in use. In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust, or other absorbent material while wearing appropriate protective equipment. Scrape up and dispose of in accordance with information given under PESTICIDE DISPOSAL. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300. **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:** Returnable/Refillable Sealed Container: Do not break seals or add any material to the container. Do not rinse container or empty any residue from container. This container must be returned intact after use to the point of purchase.

GENERAL INFORMATION

Mix Parathion 6-3 in water to form an emulsion spray solution. To make the spray solution, fill the spray tank half full with water, agitate, add the proper amount of Parathion 6-3 and then fill the spray tank with water while still agitating. Continue to agitate during use. Aircraft should apply the recommended amount of Parathion 6-3 in not less than 1 gallon of water per acre. Always use sufficient water for adequate coverage of the crop foliage. Where a dosage range is given, use the lower rate on small or young plants or with light insect infestations. Use the higher rate on mature plants or with heavy insect infestations. The amounts given to use are the amounts of Parathion 6-3 to apply per acre per application. The hazards and precautions for handling Parathion 6-3 are equally applicable to it after dilution with water for spray application. **General Warnings and Limitations:** Do not plant any food or feed crop in Parathion 6-3 treated soils other than those with registered Parathion 6-3 uses.

ALFALFA: For three-cornered alfalfa hoppers, alfalfa caterpillars, and spittle-bugs, use 1/4 pint per acre. For aphids, alfalfa weevil larvae and adult weevils, armyworms up to third instar, cloverleaf weevils, climbing cutworms, webworms, grasshoppers, crickets, spotted alfalfa aphids, leafhoppers, Lygus bugs, thrips, and tortricid moths, use 1/4 to 2/3 pint per acre. For alfalfa seed chalcids control on alfalfa grown for seed, use 1/4 to 2/3 pint per acre. California and Nevada regulations limit the use of this material to not more than 2/3 pint per acre. For clover head weevils, spider mites, blister beetles, Asiatic garden beetles, sweet clover weevils, and green June beetles, use 2/3 pint per acre. For beet armyworms and corn earworms, use 2/3 to 1 pint per acre. Do not spray alfalfa during bloom period to avoid injury to honey bees. Do not apply within 15 days of harvest, cutting or forage use. Do not apply if the crop or weeds in the treatment area are in bloom. Do not reenter treated fields for 3 days.

CORN: For control of European corn borers, use 3/5 pint per acre. Apply the first spray when 75% of the corn plants show shot-hole feeding and follow with two additional sprays at 5 to 7 day intervals. Use sufficient water per acre to provide complete coverage and be certain whorls of plants are well treated. For corn leaf aphids, use 1/2 pint per acre. For fall armyworms, corn rootworm adults, armyworms up to third instar, climbing cutworms, grasshoppers and Japanese beetles, use 2/3 pint per acre. To control stink bugs and spider mites, use 1/2 pint per acre. To control corn earworm, use 3/5 pint per acre and apply to silks as soon as they appear. Make 3 to 4 applications at 2 to 3 day intervals as infestation warrants.

CORN (Sweet): To control fall armyworms, aphids and spider mites, use 1/2 pint per acre. To control sap beetles and spider mites, use 2/3 pint per acre. To control corn earworm apply to silks as soon as they appear. Make 3 to 4 applications at 2 to 3 day intervals as infestation warrants. Reapply immediately after rain. To control chinch bugs, use 1 pint per acre. If crop is intended for canning, consult your cannery fieldman prior to application. Do not apply within 12 days of harvest. Do not reenter treated fields for 6 days.

COTTON: To control aphids, mites, cotton leafworms, cotton leafhoppers, garden webworms and thrips, use 1/2 pint per acre. For cabbage loopers, use 2/3 to 1 1/3 pint per acre. For boll weevils and stink bugs, use 2/3 to 1 pint per acre. For salt-marsh caterpillars, use 2/3 to 1 pint per acre. For bollworms, cotton leaf perforators, Lygus bugs, false chinch bugs, serpentine leaf miners and southern garden leafhoppers, use 1/2 pint per acre. Make first application when insects appear and repeat at 7 day intervals if required. If desired, this formulation may be combined with other insecticides in a complete cotton spray program. Do not feed cotton trash to dairy animals or animals being finished for slaughter within 15 days of application. Do

(5481-437.PMS/EPA Cont. Vers. of 10-21-91 Accor'd copy
This revs. dated 04-15-97 is Methyl Para. Label additions of 03-25-97)

EPA REG. NO.5481-437 EPA EST 5481-CA-1

NET CONTENTS 5 GALLONS

**AMVAC CHEMICAL CORPORATION
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LOS ANGELES, CA 90023 U.S.A.**