



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Jon C. Wood
Amvac Chemical Corporation
4695 McArthur Court, Suite 1250
Newport Beach, CA 92660

APR 19 2006

Dear Mr. Wood:

Subject: Amended Label
Thimet Technical Insecticide
EPA Reg. No. 5481-529 (Formally 241-213)
Thimet MC Insecticide
EPA Reg. No. 5481-528 (Formally, 241-212)
Response to Phorate Interim Re-registration Eligibility Decision (IRED)
Dated March 2001 Case No. 0101
Review of Label Received With Your Application of November 19, 2001

On November 19, 2001 and January 28, 2005, you submitted revised labeling, cited existing data in our files to address the supporting product specific product chemistry and acute toxicity data requirements; and submitted certain product chemistry data as part of the phorate IRED. These data were reviewed and found acceptable. Both of the subject products are placed in acute toxicity category I for all routes of exposure including primary eye and primary dermal; and both are considered non-sensitizers.

The labeling for each the products referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable as a product amendment provided that you submit two copies of your final printed label for each product incorporating the following corrections before you release the product for shipment. Acceptance of the labeling does not constitute reregistration of the products.

1. Correct the directions for use statement by restricting the use to outdoor, non-domestic ground application on the listed crops so that it reads as it appears on the previously accepted label for the products and as cited below.

“Only for formulation into insecticide and/or nematocide products intended for outdoor, non-domestic use on terrestrial crops by ground application for: ___ “

2. Correct the EPA Reg. No. and company name and address to reflect the transfer of the product from BASF Corporation to Amvac Chemical Corporation.

3. Add the statements cited below to the human precautionary section as the second and third statements in the section.

Corrosive. Causes irreversible eye damage.

4. Add the statement cited below to the Note to physician section.

Probable mucosal damage may contraindicate the use of gastric lavage.

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

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

The revised Confidential Statement of Formula (CSF) submitted for each of the subject products and dated January 27, 2005 is acceptable and has been incorporated into our file for each product. It is understood that the January 27, 2005 CSF replaces all previous CSFs submitted for the products.

The additional item cited below is required prior to the issuance of any reregistration of the products.

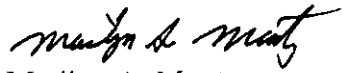
The data compensation regulations and procedures must be met for all the generic data requirements for the subject products. They may be addressed by citing the supporting generic data in the IRED, Appendix B. Since the IRED has been issued for the active ingredient, the cite-all method of support may not be utilized for reregistration of the subject products. The data cited/provided with your subject reregistration application did address these requirements for certain of the generic data; i.e. product chemistry data and the generic acute toxicity data.

This letter addresses the product specific data requirements and any label revisions needed to comply with the risk reduction labeling measures specified in the IRED as well as any revisions deemed necessary to reflect the results of the supporting product specific data. It does not address any generic data for the product that may have been submitted to the Agency in response to the generic data call-in associated with the subject IRED.

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Any reregistration of the products must await completion of the cumulative risk assessment for the organophosphate pesticides.

Sincerely,



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

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THIMET®
MC Insecticide
For Manufacturing Purposes Only

Only for formulation into an insecticide for the following uses: beans, corn (field and sweet), cotton, peanuts, potatoes, sorghum, soybeans, sugar beets, sugarcane, and lilies (24c use only).

Active Ingredient:

Phorate: 0,0-diethyl S-[(ethylthio) methyl] phosphorodithioate.....91.6%

Inert Ingredients:.....8.4%

Total.....100.0%

(1 gallon contains 8.2 lbs of Phorate)

EPA Reg. No. 241-212

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

DANGER! PELIGRO!



POISON

See Side Panel for Additional Precautionary Statements

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 19 2006

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

5481-5-28 (Formally 241-212)

PRECAUCION AL USUARIO: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

FIRST AID

Contains an organophosphate that inhibits cholinesterase.

IF SWALLOWED:

Call a poison control center or doctor immediately for treatment advice.
Have person sip a glass of water if able to swallow.
Do not induce vomiting unless told to do so by a poison control center or doctor.
Do not give anything by mouth to an unconscious person.

IF INHALED:

Move person to fresh air.
If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.
Call a poison control center or doctor for further treatment advice.

IF IN EYES:

Hold eye open and rinse slowly and gently with water for 15-20 minutes.
Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

Take off contaminated clothing.
Rinse skin immediately with plenty of water for 15-20 minutes.
Call a poison control center or doctor for treatment advice.

ANTIDOTE: Atropine is an antidote.

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IN CASE OF AN EMERGENCY ENDANGERING LIFE OR PROPERTY INVOLVING THIS PRODUCT, CALL DAY OR NIGHT 800-832-HELP.

CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING

NOTE TO PHYSICIANS: Warning signs and symptoms include weakness, muscle twitching, headache, tightness in chest, respiratory depression, blurred vision, miosis, hypersecretion, nausea, vomiting, diarrhea, and abdominal cramps. If poisoning is probable, treat the patient immediately. Clear airway and provide oxygen before administering atropine. Give atropine intravenously (IV), intramuscularly, or through an alternative route such as an endotracheal tube. Depending on severity of poisoning, use 2 to 4 milligrams IV in adults (or 0.05 mg/kg in children under 12 years) every 10 – 15 minutes until fully atropinized as shown primarily by control of pulmonary secretions. Proceed concurrently with decontamination using proper protective gear; for example, chemical-resistant gloves rather than cotton or leather ones. Use soap (preferably, tincture of green soap) and water, or a dilute hypochlorite solution, for decontaminating skin. Maintain atropinization by repeated doses based on recurrence of symptoms. Twenty to thirty milligrams, or more, may be required during the first 24 hours, and preservative-free atropine preparation should be used if large doses are required. Generally, inducing emesis is not advisable. Avoid opiates, parasympathomimetic agents (e.g., succinylcholine), theophylline, reserpine, and phenothiazines. Suction oral secretions and emesis to avoid aspiration. Artificial respiration or oxygen administration may be necessary. If not contraindicated, gastric emptying by lavage may be considered after ingestion of a potentially life-threatening amount if it can be performed soon after ingestion (within an hour). A slurry of activated charcoal may be medically warranted at an oral dose appropriate for adult, child or infant. For seizures, give a benzodiazepine intravenously. Observe patient continuously for at least 72 hours. Allow no further exposure until cholinesterase regeneration has taken place as determined by blood tests.

Pralidoxime chloride (2-PAM; PROTOPAM chloride) appears to be an effective adjunct to atropine, especially in those severely ill and if given soon. Before it's administered, obtain a blood sample for cholinesterase analysis. Adjusting for age and weight, pralidoxime may be administered as a continuous infusion after a loading dose or using a bolus method.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER!

Danger, fatal if swallowed, inhaled or absorbed through the skin. Rapidly absorbed through skin. Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to poisoning.

DO NOT GET IN EYES, ON SKIN, ON CLOTHING

Wear clean chemical-resistant gloves, goggles and clean waterproof or freshly laundered protective clothing (coveralls, rubber boots, cap, etc.). Destroy and replace gloves frequently. Wash thoroughly with soap and warm water before eating or smoking. Bathe immediately after work and change all clothing. Wash clothing thoroughly with soap and hot water before re-use. In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water.

DO NOT BREATHE MIST

Wear a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter. If handled indoors, provide mechanical exhaust ventilation. Remove unauthorized persons from operating area.

LOT NO. -
AV. GROSS-
NET WEIGHT:

BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

ENVIRONMENTAL HAZARDS

This chemical is very highly toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirement 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 Environmental Protection Agency.

STORAGE AND DISPOSAL

- STORAGE:** Do not contaminate water, food or feed by storage or disposal.
- PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Do not contaminate water, food, or feed by storage or disposal. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. Dispose of excess or waste pesticide by use according to label directions, or contact your State Pesticide or Environmental Control Agency or the hazardous waste representative at the nearest EPA Regional Office for guidance.
- SHIPPERS:** Should spillage or leakage occur in transit, decontaminate area by covering spillage with an absorbent such as a soda, ash, lime, clay or sawdust. Sweep up and wash area thoroughly with a full-strength, liquid household chlorine bleach. Dispose of waste as above.
- PRIOR TO CONTAINER DISPOSAL:** Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid and/or vapor residues. Continue to observe all precautions, if any, on label. Do not cut, torch or weld on or near the emptied drum.
- CONTAINER DISPOSAL:** Drain drum completely. Add 5 gallons of water, 1 cup of detergent and 2 pounds of lye. Tighten bungs. Rotate drum to wet all surfaces and let stand for at least 15 minutes. 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.

Before using THIMET MC for the preparation of insecticides, manufacturers should consult BASF Corporation (BASF) for manufacturing and handling instructions.

Only for formulation into an insecticide for the following uses: beans, corn (field and sweet), cotton, peanuts, potatoes, sorghum, soybeans, sugar beets, sugarcane, and lilies (24c use only).

Refer to attached Technical Bulletin for formulating and other information.

DISCLAIMER

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BASF Corporation (BASF) warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the directions for use. Any damages arising from a breach of this warranty shall be limited to direct damages, and shall not include consequential commercial damages such as loss of profits or values, or any other special or indirect damages.

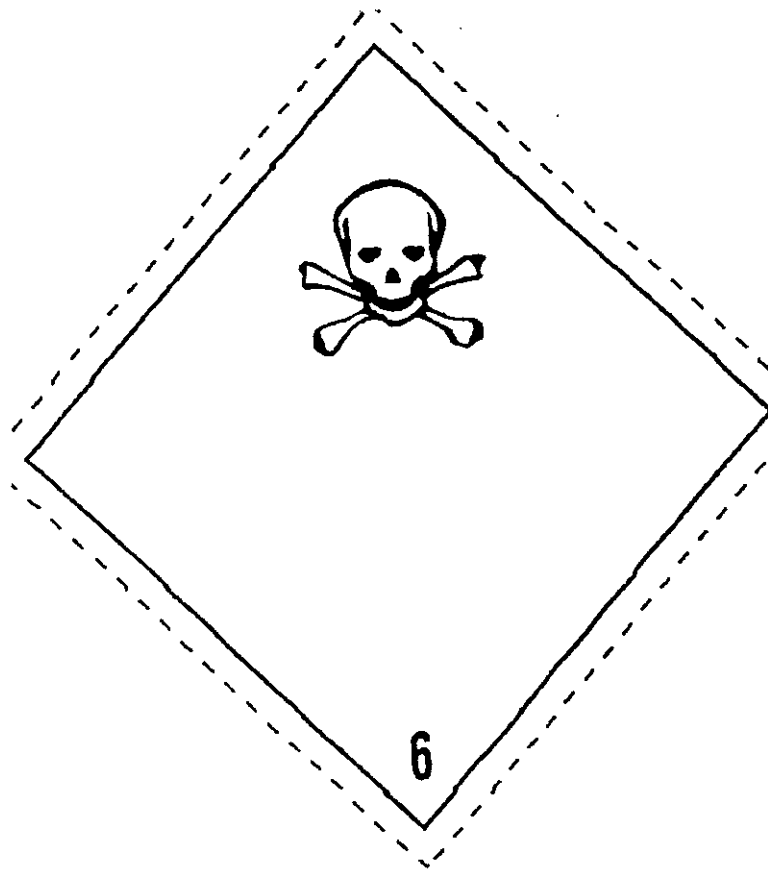
BASF makes no other express or implied warranty, including any other express or implied warranty of FITNESS or of MERCHANTABILITY.

BUYER assumes the risk of any use contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable by BASF.

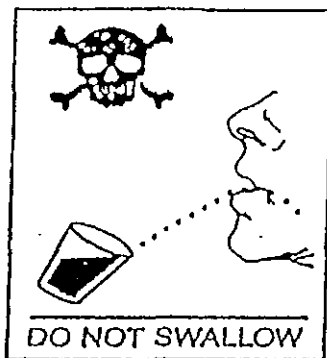
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DOT/IMO:

ORGANOPHOSPHORUS PESTICIDE,
LIQUID, TOXIC, (PHORATE),
UN3018, RQ

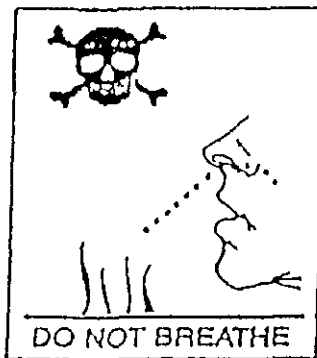


DANGER—POISON—PRECAUTIONS



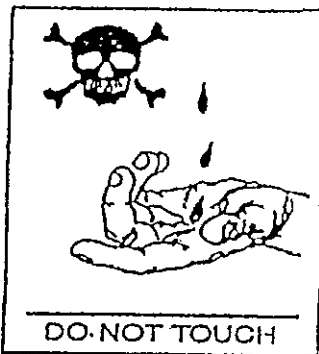
CAN KILL YOU IF SWALLOWED

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



CAN KILL YOU IF BREATHED

This product can kill you if vapors are breathed.



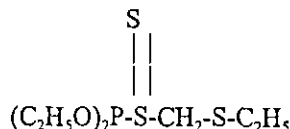
CAN KILL YOU BY SKIN CONTACT

This product can kill you if touched by hands or spilled or splashed on skin, in eyes or on clothing (liquid goes through clothes).

TECHNICAL INFORMATION

GENERAL PROPERTIES

CHEMICAL NAME AND STRUCTURES: THIMET® soil and systemic insecticide is 0,0,-diethyl S-[(ethylthio)methyl] phosphorodithioate represented by the structural formula:



EMPIRICAL FORMULA: C₇H₁₇O₂PS₃ Mol. Wt. 260.37

COMMON NAME: phorate

CLASS: organophosphate

CHEMICAL AND PHYSICAL PROPERTIES: Technical THIMET soil and systemic insecticide is a clear liquid with a melting point of less than -15°C. The water solubility is quite low, approximately 50 ppm. It is miscible in xylene, vegetable oils, carbon tetrachloride, alcohols, ethers, and esters. At room temperature technical THIMET is known to be stable for at least two years. It is subject to hydrolysis under alkaline conditions. The commercial formulations have satisfactory stability.

THIMET COMMERCIAL PRODUCTS: THIMET end-use product granules are formulated on 24/48 mesh size attapulgate-type carriers. They are free-flowing granules that allow for easy calibration of granular equipment now being used by growers.

PHYTOTOXICITY: Injury may occur if THIMET granules are placed in direct contact with the seeds of beans, soybeans, field and sweet corn, grain sorghum, and sugar beets.

RESIDUES: The Office of Pesticide Programs, Environmental Protection Agency, has accepted label claims for crops listed in this bulletin.

TOXICITY: THIMET technical and its formulations are poisonous by skin contact, inhalation or swallowing. THIMET formulations have been registered with the Environmental Protection Agency for various insecticidal uses by different methods of application. It is important that you use THIMET formulations only for the specific purposes for which they are registered, and that you read and follow the precautionary instructions on the label before using.

The acute oral and dermal toxicity of THIMET 20-G are as follows:

	<u>Oral LD50 (rat)</u>	<u>Dermal LD50 (rabbit)</u>
THIMET 20-G	5.1 mg/kg	32.5 mg/kg

THIMET 20-G is irritating to rabbit eyes.

®Registered trademark of BASF

TECHNICAL INFORMATION

GENERAL PROPERTIES

Phorate can be absorbed through ocular exposure and can product systemic effects. Airborne phorate can be absorbed through the lungs to product cholinesterase inhibition.

EMERGENCY NUMBER

In case of an emergency endangering life or property involving this product, call day or night 800-832-HELP.

HANDLING AND STORING: DO NOT BREATHE DUST, GET IN EYES, ON SKIN OR ON CLOTHING.

Persons handling this product should wear freshly laundered long-sleeved work clothing, a NIOSH approved respirator and chemical-resistant gloves. Destroy and replace gloves frequently. Wash hands thoroughly before eating, smoking or going to the bathroom. At the end of the work day, a shower should be taken and clothes changed completely. Work clothing should be laundered separately before reuse.

In case of contact, immediately remove contaminated clothing and rinse skin immediately with plenty of water for 15-20 minutes. Symptoms of organophosphate poisoning include headache, blurred vision, constricted pupils, weakness, nausea, abdominal cramps, diarrhea and a feeling of tightness in the chest. Excessive sweating and excessive salivation may also be present. A physician should be called immediately in all suspected cases of organophosphate poisoning. The physician may call the BASF emergency phone number for additional assistance and information if needed.

Organophosphate pesticides should be stored in a well ventilated area. **Never store pesticides adjacent to products intended for human or animal consumption.** Do not use or store THIMET in or around the home.

SPILL AND LEAK PROCEDURES: Restrict traffic in the area of the spill. Individuals performing cleanup and decontamination must wear proper protective equipment which includes; chemical-resistant gloves, chemical-resistant boots, long sleeved protective coveralls, cap, NIOSH approved respirator and splash goggles.

Cleanup personnel should carefully sweep up spilled material and place into an approved, labeled container (salvage drum). Material should be reworked or disposed of in accordance with Federal (EPA) and State Regulations. Also place broken bags into approved, labeled containers. After cleanup, scrub the affected area thoroughly with a solution of 85% water, 10% bleach (e.g. Clorox) and 5% isopropyl alcohol. Allow the solution to stand for 10-15 minutes. Absorb the solution with an absorbent material such as clay or cat litter and dispose of as outlined above. Thoroughly rinse the affected area with water and repeat the process. At the completion of cleanup and decontamination procedures, the cleanup personnel must shower and change clothes completely. Clothing must be laundered separate from other wash before reuse. Gloves, boots, respirator, and goggles must be cleaned and decontaminated.