



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

S503212

APR 02 1996

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Raymond H. Smith
Product Manager
Voluntary Purchasing Groups, Inc.
P.O. Box 460
Bonham, TX 75418

Gentlemen/Madame:

Subject: Deletion of Unsupported Ethion Uses and
Product Name Change
Ferti-lome Citrus Spray
EPA Registration No. 7401-113
Your Application Dated August 24, 1994
Federal Register Notice of June 15, 1994

During a recent review of our files for the subject product, it was noted that your amendment application and revised labeling proposing use deletions submitted on August 24, 1994 were not accepted for processing because they failed to comply with PR Notice 91-1. This Notice described the procedures for requesting the deletion of uses which were in effect at that time.

In May, 1995, the Agency issued PR Notice 95-2, which, among other things, amended PR Notice 91-1 to allow processing of certain use deletion requests submitted in response to a data call-in (DCI) to proceed to completion without submittal of the formal amendment as described in the earlier PR Notice 91-1. The subject use deletion request falls within this category. Accordingly, we have completed our processing of your subject use deletion request and the results are described below.

The labeling referred to above, submitted in connection with registration under FIFRA, is acceptable, provided that you:

1. Submit one copy of your final printed labeling incorporating the following corrections before you release the product for shipment. The corrections specified in the following items 1.a. and 1.b. are needed to maintain consistency with the particular citrus use pattern being supported by the basic registrants. Product labels deviating from this supported use pattern will be subject to the additional data requirements needed to support such deviations.

A copy of the registered basic producer label for the use of ethion on citrus (EPA Reg. No. 279-1254) is enclosed for your



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

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reference.

a. Delete the statement, "May be applied up to the day of harvest." and correct the preharvest interval (PHI) statements now appearing on your label with a PHI of 15 days for lemons, limes, tangelos and tangerines and a PHI designation of 0 days for grapefruit and oranges.

b. The maximum allowable application rate being supported for use of ethion on the specified citrus crops is 3.0 pounds of the active ingredient (a.i.) ethion per acre with a seasonal maximum of 9 pounds of a.i. per acre. Correct your use directions to fall within the specified maximum allowable a.i. being supported.

c. Update the 7th paragraph on page two. "This product is toxic to fish ____" to read as stated below and place it under the heading, "Environmental Hazards". Refer to page 41 of the 1989 Registration Standard for ethion. A copy of this page is enclosed for your reference.

"Environmental Hazards

This pesticide is toxic to fish, and aquatic invertebrates. Fish and aquatic invertebrates may be killed in areas where this pesticide is used. Do not contaminate water when disposing of equipment washwaters."

d. Add the statement, "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." immediately under the heading "Directions for Use."

e. Update your storage and disposal statements as directed in the attached copy of PR Notices 83-3 and 84-1.

f. Correct your label to include the appropriate first aid or antidotal statements to be added under the general heading, "Statements of Practical Treatment" and the subheadings, "If swallowed:"; "If inhaled:"; "If on skin:"; and "If in eyes:". Refer to the enclosed sample label for the correct format.

g. Is the product intended for use in the home garden only or is it intended for use by the commercial grower as well? Though home use is implied by the statement, "This product when used according to directions, will give quick and lasting control of mites and scale insects in your home garden.", the use directions implies use of the product on large commercial crop areas, i.e. dilution rates expressed per hundred gallons and the reference to mixing the product with other pesticides.

If your product is intended for use by the commercial grower, it is considered to fall within the scope of PR Notice 93-7, which describes the Worker Protection Standard labeling

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requirements.

If your product is intended for home garden use only, delete current label statements implying commercial use. Refer to the enclosed copy of page 6 (IV.E.) from PR Notice 93-7 for a listing of such label statements and also to the enclosed copy of Supplement F from PR Notice 93-11 for guidance on removing home use products from the scope of WPS.

2. Within 30 days from the date of this letter, submit your completed EPA Form 8570-1, revised to show whether the product is packaged in Child Resistant Packaging (CRP) and to specify the container size(s). Your submitted form dated August 24, 1994 did not include this information (section III, item 1 of the form).

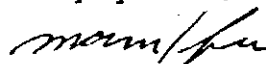
Based on the toxicity category II signal word, "Warning" appearing on your product, it may be subject to the CRP regulations. Your submitted EPA Form 8570-1 dated August 24, 1994 failed to specify whether the product was packaged in CRP. A copy of these regulations as published in the Federal Register of June 11, 1986 is enclosed for your reference.

3. Within 30 days from the date of this letter, submit your updated Confidential Statement of Formula (CSF), EPA Form 8570-4 corrected to show your current source of the active ingredient, ethion. The product cited on your most recent CSF in our files, dated October 27, 1981 was canceled in July 15, 1986. A copy of this form is enclosed for your use.

If these conditions are complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label bearing the new product name, "Ferti-lome Citrus Spray" and showing deletion of the unsupported uses is enclosed for your records.

Sincerely yours,



Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (7504C)

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ferti-lome (R)

Citrus Spray

* Controls Mites and Scale INsects on Texas and Florida Citrus Including Grapefruit, Lemons, Limes, Oranges, Tangelos and Tangerines.

* 4-6 Teaspoons make 1 gallon of spray.

* FOR USE IN FLORIDA AND TEXAS ONLY

ACTIVE INGREDIENT:

*Ethion.....	9.0%
Petroleum Oil (Superior Type 60 Second oil).....	75.0%
INERT INGREDIENTS.....	16.0%
TOTAL.....	100.0%

*0,0,0',0', Tetraethyl S,S'-Methylene bisphosphorodithioate

This product contains 0.67 pounds of ethion per gallon.
U.S. Patent No. 2,873,228

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

ACCEPTED
WITH COMMENTS
in EPA Letter dated

APR 02 1996

Under the Federal Insecticide-
Fungicide and Rodenticide Act
2401-113

1. WHAT IS THIS PACKAGE FOR?

ferti-lome Citrus Spray was developed to control mites and scale crawlers on Texas and Florida citrus as specified below.

2. HOW DO YOU USE IT?

DIRECTIONS FOR USE

Unless otherwise specified begin applications when scale "crawlers", or mites first appear. Thorough coverage of foliage and branches is necessary for good control. Observe precautions of use on labels to assure proper mixing and compatibility when using this material with other pesticide products.

GRAPEFRUITS, LEMONS, LIMES, ORANGES, TANGELOS, TANGERINES:

Against Citrus red mite, Citrus rust mite, Texas Citrus mite, Black scale, Chaff scale, Florida red scale, Clover scale, Purple scale, Snow scale, Yellow scale use 2 quarts per 100 gallons of water. (1 Pint per 25 gallons of water, 4 teaspoons per gallon of water). Do not apply more than 2,000 gallons of spray per acre. Apply when insects first appear and repeat as required. When snow scale is a problem, it is important that trunks, limbs and twigs are thoroughly sprayed. On grapefruit, oranges and tangerines do not apply within 90 days of preceding treatment. May be applied up to day of harvest. ON tangerines do not apply within 90 days of preceding treatment. Do not apply more than twice per season. May be applied up to day of harvest. On lemons and limes do not apply more than once per season. Do not apply within 21 days of harvest.

USAGE CAUTION: USE OF THIS MATERIAL IN A MANNER OR AT A TIME OTHER THAN IN ACCORDANCE WITH THE DIRECTIONS MAY PRODUCE PLANT INJURY, EXCESS RESIDUE OR OTHER UNDERSIRABLE RESULTS. Avoid application of oil sprays to plants suffering from a lack of moisture.

3. HERE ARE THE RESULTS YOU MAY EXPECT!

This product when used according to directions, will give quick and lasting control of mites and scale insects in your home garden.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING -

Harmful if swallowed. May be absorbed through skin. Do not breathe vapor or spray mist. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling. Avoid storage near food and feed products. Ethion is a cholinesterase inhibitor. Atropine is antidotal.

This product is toxic to fish and wildlife. Birds feeding on treatment area may be killed. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label. Keep out of lakes, streams and ponds. Do not apply when weather conditions favor drift of spray from areas treated.

This product is toxic to bees and should not be applied when bees are actively visiting the area. -

Food utensils such as teaspoons or tablespoons should not be used for food purposes after use with insecticides.

Rinse equipment and containers and dispose of wastes by burning at least 18 inches deep in non crop lands away from water supplies. Do not re-use container: smash and bury with wastes.

Do not apply within 2 weeks of a sulfur application or within 7 days of captan. Do not use oil on navel oranges.

DO NOT STORE AT TEMPERATURES BELOW 32°F.

WARNING-FLAMABLE! DEEP AWAY FROM HEAT AND OPEN FLAME.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Voluntary Purchasing Groups, Inc.

Bonham, Texas 75418

EPA REG. NO. 7401-113

EPA EST. NO. 7401-TX-1

NET CONTENTS 1 PINT (16 FL. OZS.)