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7946-11

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JUN 6 1996



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C. 20460

\$56 2094 $\frac{300}{18}$

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Dale Dodds
J.J. Mauget Company
2810 North Figueroa Street
Los Angeles, CA 90065

Dear Mr. Dodds:

Subject: Inject-A-Cide-B
EPA Reg. No. 7946-11
Your Application of February 10, 1996

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you:

Submit one copy of your final printed label incorporating the following corrections before you release the product for shipment.

1. Add "Dermal toxicity" to the Restricted Use Pesticide statement, "Due to acute oral toxicity" so that it reads, "Due to acute oral and dermal toxicity". Refer to the enclosed copy of page 5698 from the Federal Register Notice of January 19, 1981.

This Notice published the classification of several pesticides including the classification of all uses of dicotophos as restricted use based on acute dermal toxicity.

Additionally, our previous letter of June 1, 1994 which accepted your labeling submitted October 15, 1994, also requested the addition of the statement, "Due to acute dermal toxicity"

2. Delete the following statement which appears on the front panel in the Restricted Use Classification box. Refer to the enclosed copy of PR Notice 93-1 which specifies the statements which may appear in this box.

"All training instructions and all governmental and private applicator organizations must be approved by the J.J. Mauget Co."

Such a statement would not be needed in light of the restricted use classification and the requirement that the product only be used by certified applicators or persons under their direct supervision.



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

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3. Revise the "If/ Swallowed" practical treatment statements to read as stated below.

"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. Do not induce vomiting or give anything by mouth to an unconscious person.

4. Add the sentence, "Get medical attention." to the "If on skin:" practical treatment statement.

5. Reinstate the instructions for use of a face mask/respirator as they appear on your label accepted June 1, 1994. Though your submitted label bears the Worker Protection Standard (WPS) exclusionary statement and does not bear uses that would come under the scope of WPS, this does not allow for the removal of applicator protection statements previously accepted for use of the product on non-WPS uses.

Further, it is noted that the labeling submitted in response to the WPS which was accepted February 24, 1995 does include the respirator statement for use in confined space.

If you intend to request that the use of a mask/respirator be removed from the label, submit your request as a separate application amendment along with your justification for such removal for our evaluation. We have no information in our files showing that the labeling instructions for use of a mask or respirator is no longer required for the subject product.

6. Delete the added statement, "Repeated skin contact causes allergic reactions in some individuals." This statement is not appropriate for a product bearing the statement, "fatal if absorbed through the skin." The skin sensitizing statement, "This product has a strong skin sensitizing potential." which appears on the label for the similar dicrotophos product registered under EPA Reg. No. 5481-448 would be more appropriate.

7. Correct the first two statements in the "Precautionary Statements" paragraph to reflect the high acute toxicity of the product so that they read as follows:

" Fatal if swallowed, inhaled or absorbed through the skin. Do not get in eyes, on skin, or on clothing. Do not breath vapors. "

8. In the paragraph number 10 of the submitted directions pamphlet, add the following statement.

"Applicators shall not leave capsules unattended while in use."

If this condition is not 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 this condition.

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

Sincerely yours,

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

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(FRONT PANEL)

RESTRICTED USE PESTICIDE

DUE TO ACUTE ORAL TOXICITY

FOR RETAIL SALE TO AND USE BY CERTIFIED APPLICATORS OR PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATOR'S CERTIFICATION.

NOTE: All training instructions and all governmental and private applicator organizations must be approved by the J.J. Mauget Co.

**MAUGET
INJECT-A-CIDE^R B**
(CONTAINS BIDRIN^R)*

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN - 6 1996

INTERNAL TREATMENT BY MICRO-INJECTION FOR SYSTEMIC SUPPRESSION OF CERTAIN INSECTS ON ORNAMENTAL TREES

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

(ORGANOPHOSPHOROUS PESTICIDE, LIQUID, TOXIC, N.O.S.)

7946-11

ACTIVE INGREDIENT:

Dicrotophos

(Dimethyl phosphate of 3-hydroxy-N, N-dimethyl-cis-crotonamide)

82.0%

INERT INGREDIENTS:

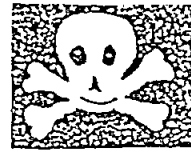
18.0%

TOTAL

100.0%

KEEP OUT OF REACH OF CHILDREN

**DANGER
PELIGRO**



POISON

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

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Vomiting should be induced. Administer water freely and induce vomiting by giving one dose (1/2 oz. or 15 ml.) of syrup of ipecac. If vomiting does not occur within 10 to 20 minutes, administer second dose. If syrup of ipecac is not available, induce vomiting by sticking finger down throat. Repeat until vomit fluid is clear. Never give anything by mouth to an unconscious person. Professional medical assistance should be secured immediately.

If on skin: Remove contaminated clothing and wash skin with soap and warm water.

If in eyes: Wash with flowing water for at least 15 minutes. Get medical attention if irritation persists.

If inhaled: Remove victim to fresh air. Give artificial respiration and get medical attention if necessary.

Bidrin is an organophosphate pesticide that inhibits cholinesterase.

NOTE TO PHYSICIAN

This product is a cholinesterase inhibitor. If signs of cholinesterase inhibition appear, atropine is antidotal. 2-PAM may also be used in conjunction with atropine, but should not be used alone.

IN CASE OF EMERGENCY:

(1-800-535-5053) is the telephone number of the Infotrac Chemical Emergency Response System.

See side panel for additional Precautionary Statements

MFG. BY
CITY, STATE
EPA REGISTRATION NO.
ESTABLISHMENT NO.

J.J.MAUGET CO.
LOS ANGELES, CA. 90065
7946-11
7946-CA-1

TOTAL NET CONTENTS:
300 individual units
vol. wt.
1 ml .04 oz.
2 ml .09 oz.
3 ml .13 oz.

* Bidrin is registered trademark of AMVAC Chemical Corporation.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Fatal if swallowed or absorbed through the skin. Do not breath vapors. Do not contaminate food or feed products. Repeated exposures to cholinesterase inhibitors such as are contained in this product may, without warning, cause prolonged susceptibility to very small doses of any cholinesterase inhibitor. Repeated skin contact causes allergic reactions in some individuals.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Chemical resistant gloves
- Shoes plus socks
- Protective eyewear

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning and maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

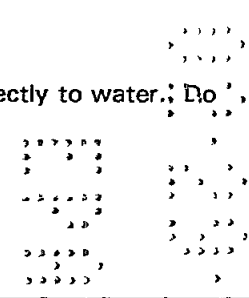
- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic organisms and wildlife. Do not apply directly to water.; Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Flammable, keep away from heat or open flame.



DIRECTIONS FOR USE

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IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Read entire label before using this product.

Not for use on trees being grown for sale or other commercial use, or for commercial seed production, or for the production of timber or wood products, or for research purposes.

GENERAL DIRECTIONS

Measure the tree at chest height in inches. If measuring the circumference of the tree, divide this number by six (6) to determine the number of capsules needed. If measuring the diameter of the tree, divide this number by two (2) to determine the number of capsules needed. Apply the injector units around the tree at the root flare. Consult the enclosed pamphlet "Directions for use and application of Mauget Injector Units" for additional instructions. Applicators shall not leave capsules unattended while in use. Remove capsules promptly after treatment.

RESTRICTIONS

Do not inject trees that are less than two inches in diameter.

Do not inject trees within two weeks of any other spray or soil chemical treatment.

Do not treat trees that are suffering from stress such as lack of moisture or herbicide damage.

This product is NOT to be used on trees which will produce food within the year following treatment (i.e. maple syrup).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place away from heat and open flame. Store in original container and out of the reach of children, preferably in a locked storage area. Always keep capsules in an upright position. If capsules are leaking, triple rinse with water. Dispose of rinsate in approved manner. In spill or leak incidents, keep unauthorized people away.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide 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.

CAPSULE DISPOSAL: Immediately upon removing from tree, place capsules in a 5 ml plastic bag of the type which is part of the packaging of Inject-A-Cide "B" under DOT-E-8386. Then enclose in the original shipping carton to be transported to a facility for disposal in a manner authorized by State and Local Authorities.

NOTICE OF WARRANTY

J.J. Mauget Co. makes no warranty regarding merchantability, fitness for any purpose or otherwise, expressed or implied, concerning this product or its uses which extend beyond the use of the product under normal conditions in accordance with the statements made on this label.

J.J. MAUGET CO., LOS ANGELES, CA 90065

INJECT-A-CIDE^R B APPLICATIONS

CROP or USE	INSECT/PESTS	REMARKS
Ash	Aphids Leafhopper	Inject when aphid appear Inject when leafhopper appear
Birch	Aphids Bronze Birch Borer Gypsy Moth Birch Leafminer	Inject when aphid appear Inject anytime from Spring to Fall Inject when eggs hatch (Controls 2nd-4th instar larvae) Inject when insects appear
Flowering Crabapple (non crop)	Eastern Tent Caterpillar	Inject when infestation is evident
Dogwood	Dogwood Twig Borer	Inject when infestation is evident
Elms	Aphids European Elm Scale Elm Leaf Beetle	Inject when aphid or first generation larvae begin leaf feeding. Inject when crawlers appear Inject when larvae begin leaf feeding
Black Gum	Gypsy Moth	Inject when eggs hatch (Controls 2nd-4th instar larvae)
Hackberry	Nipple Gall Psyllid Hackberry Psyllid	Inject when psyllid eggs have hatched and leaves have expanded
Linden	Aphids	Inject when aphid appear
Locust	Aphids Leafhopper	Inject when aphid appear Inject when leafhopper appear
Maples (Non Crop)	Aphids Gypsy Moth	Inject when aphid appear Inject when eggs hatch (Controls 2nd-4th instar larvae)
Oaks	Aphids California Oakworm California Tent Caterpillar Goudy and Oak Gall Wasps Gypsy Moth Obscure Scale Pit-making Scale Sycamore Borer (American Plum Borer)	Inject when aphid appear Inject at first appearance. Repeat application upon reappearance of late Summer broods Inject at 3/4 leaf on successive years Inject when eggs hatch (Controls 2nd-4th instar larvae) Inject when crawlers appear Inject when crawlers appear Inject when infestation is evident
Pines	European Pine Sawfly Pine Spittlebug Spider Mites	Inject when insect first appears Inject when insect first appears Inject when mite first appears
Flowering Stone Fruit (Non Crop)	Lesser Peachtree Borer	Inject when infestation is evident
Sycamore (Plane Tree)	Sycamore Borer (American Plum Borer)	Inject when infestation is evident
Willow	Aphids	Inject when aphid appear

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 6 1996

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

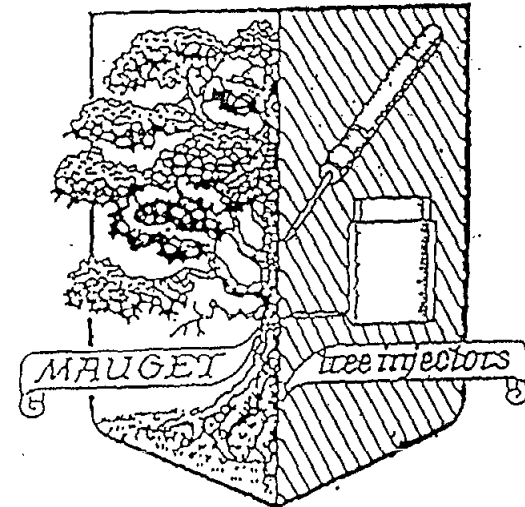
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DIRECTIONS

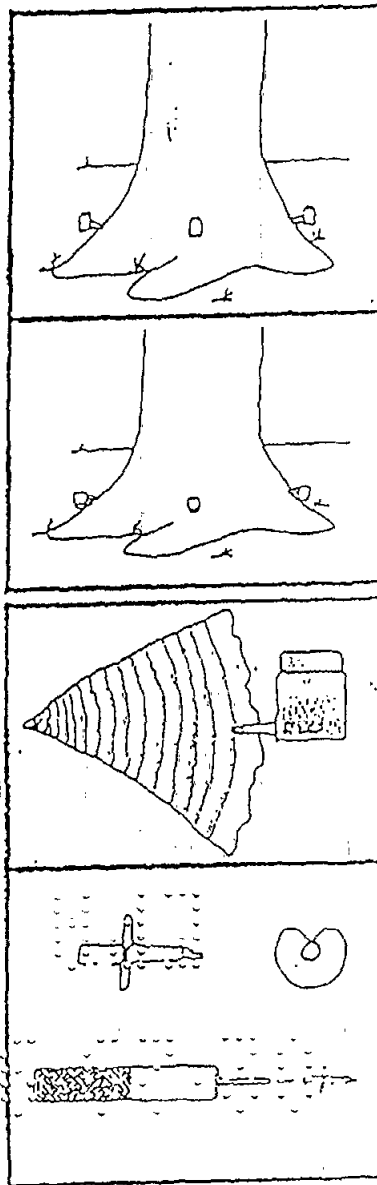
Mauget

Micro-Injection system

save trees



REFER TO PRODUCT LABEL FOR ADDITIONAL
PRECAUTIONS AND LIMITATIONS ON THE USE
OF THIS PRODUCT



9. CAPSULE POSITION

Turn the capsule right side up to allow the material to flow through the tube into the xylem and phloem tissue in the tree.

10. REMOVAL & DISPOSAL

Allow time for the tree to absorb all the liquid material. Turn the capsule upside down for a minute before removal. Applicators shall remove capsules promptly after treatment. Follow instructions on product label for capsule disposal.

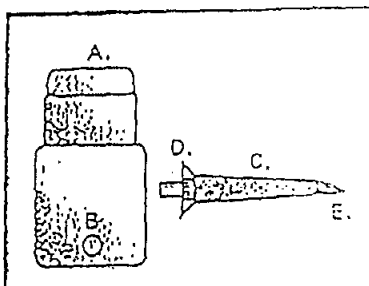
11. MICRO MINI-FEEDER TUBE

For established trees with thin bark (less than 3/8" thickness), use a 7/64" drill bit to produce a micro-injection site.

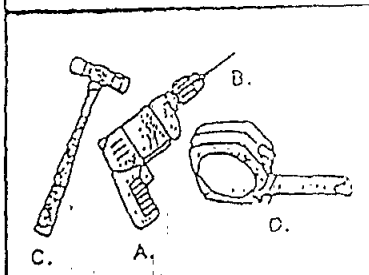
12. MICRO MINI-INSERTION TOOL

Because the 7/64" micro-injection site is so small, it is recommended that the Micro-mini insertion tool (316-NAM) be used to prevent plugging of the feeder tube & insure a clear pathway to the cambium tissue. Be sure to place the tube with the notch up.

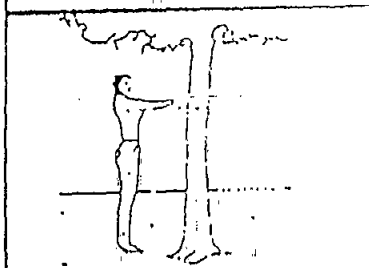
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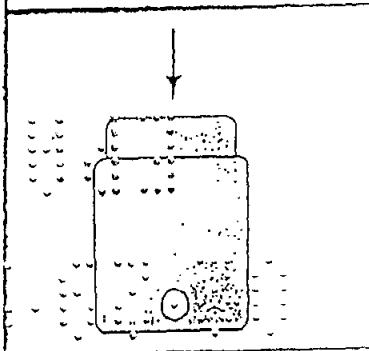
1. WHAT'S THE SYSTEM?
 A) The Mauget two piece capsule
 B) Insert hole
 C) Feeder tube
 D) Flanged gun-site end
 E) Tapered beveled end



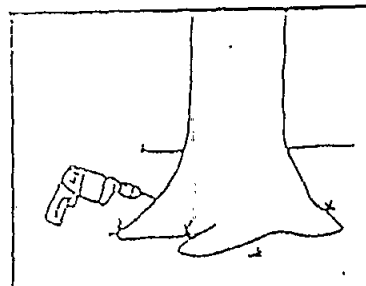
2. WHAT TOOLS ARE NEEDED?
 A) Electric drill
 B) 1 1/64" drill bit
 C) Plastic mallet (hammer)
 D) Tape measure
 E) Consult product label for specific Personal Protective Equipment (PPE) required.



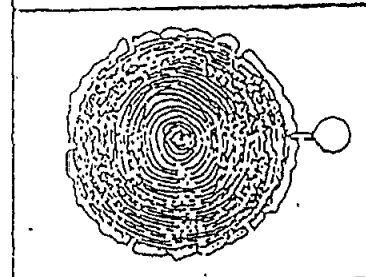
3. HOW MANY CAPSULES?
 Measure the tree at chest height. If measuring the circumference, divide this number by six (6) to determine the number of capsules needed. If measuring the diameter, divide this number by two (2) to determine the number of capsules needed.



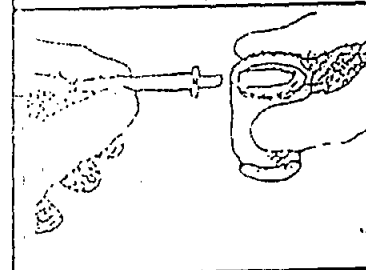
4. PRESSURIZING CAPSULE
 Place capsule on firm, flat surface and compress by pressing with bottom of foot, heel of hand or, under some conditions, with a plastic or rubber mallet.



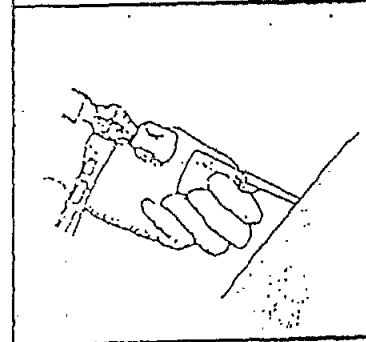
5. HOW DO I DRILL?
 Pre-drill injection site at a slight downward angle at the root flare (approximately 6" above ground level) using a clean 1/64" drill bit. Drill to a depth of 3/8" (into the healthy xylem tissue). For the Micro mini-feeder tube see #'s 11 & 12. Disinfect drill bit and Micro mini-insertion tool prior to use on each tree.



6. HOW DEEP?
 It is important that the feeder tube be set to the proper depth into the xylem. If set too deeply, flow is restricted by blockage in the heartwood; if set too shallow, leaks may occur. The feeder tubes are "beveled" cut to allow for +/- 1/4" error.



7. COMBINING CAPSULE & TUBE
 Place by hand feeder tube's flange end with flange notch upwards into a compressed inverted capsule. Push the end of the tube flush with the internal capsule seal.



8. PLACING UNIT IN TREE
 Firmly seat beveled end of feeder tube with the attached inverted capsule into the predrilled injection hole. Tap the top corner of the capsule directly behind the feeder tube with a plastic mallet while supporting the capsule with the other hand. This action will simultaneously seat the feeder tube into the tree while breaking the capsule seal and releasing the material into the tree.