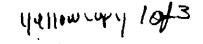
PH 19 8898-16



JUL 2 2 1991

Mr. Ruben D. Wichy Witco Corporation P.O. Box 8587 Woodcliff, New Jersey 07675

Subject: Revised Labeling--Formulations GB~1313 EPA Registration Number 8898-16 Your Submission Dated February 8, 1991

Dear Mr. Wichy:

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The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable provided that you make the labeling changes given below before you release the product for shipment bearing the amended labeling.

1. Change the Environmental Hazards section to read:

This product is toxic to fish and other aquatic organisms. Do not apply directly to water (except when applied for mosquito larvae control; then only around the borders of these areas and in shallow water.) Do not contaminate water by cleaning of equipment or disposal of equipment washwaters. Consult your State Fish and Game Agency before applying this product.

2. The statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling" must appear directly under the heading "Directions for Use."

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

The Confidential Statements of Formula (CSFs) are not acceptable. The EPA Registration Number for this product is 8898-16. However, you have indicated that the Registration Number of the source of the active ingredient, Aliphatic Petroleum Hydrocarbon, is 8898-16. A component of a formulation cannot have the same Registration Number as the formulation itself. Please identify the source of the active ingredient. Note that GB-1111 is an accepted additional brand name for this product. Product bearing this additional brand name must have the same formulation as the basic product and you need not submit an additional CSF for it.

You have also submitted a CSF with an alternate formulation for use when GB-1356 is used as the brand name. This CSF is further unacceptable because of the addition of 9-octadecen-1amine. As we stated in the Agency letter dated April 8, 1987, aliphatic amines must be declared as active ingredients. (Longchain beta-amines have larvicidal activity against some mosquito species, particularly when chain length reaches 15 carbons.) You may not have an alternate formulation that includes an additional active ingredient.

We have previously accepted GB-1356 as an additional brand name for this product. You may continue to use this additional brand name, but only on products with the same formulation as is used for GB-1313 and GB-1111.

If you wish to market a product containing 9-octadecen-1amine, you may submit an application for registration of a new product.

Sincerely yours,

DOTE

Dennis H. Edwards, Jr. Product Manager (19) Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosure

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Precautionary Statements Hazards to Humans (& Domestic Animals)

CAUTION COMBUSTIBLE

Contains Petroleum Distillate

Contact May Irritate Skin. Causes Eye Irritation. May be Fatal If Swallowed. Potential Inhalation Hazard.

Avoid contact with eyes, skin and clothing. Wear goggles and rubber gloves. Use with adequate ventilation. Avoid breathing vapor or spray mist. Wash thoroughly after handling. Remove contaminated clothing and wash before re-use. Respiratory protection may be required.

Environmental Hazards:

Do not apply to moving water when there is danger of damage to valuable fish or wildlife. Do not apply to lakes, streams, gonds, tidal marshes and estuaries where there is danger of damage from drift into sensitive areas. Do not contaminate water by cleaning of equipment or disposal of wate.

Physical and Chemical Hazards:

COMBUSTIBLE — Do not use, store, pour or splil near flames or excessive heat. In case of fire, use water spray, toam, CO₂ or dry chemical.

INERT INGREDIENTS..... 1.3%

KEEP OUT OF REACH OF CHILDREN

CAUTION

First Aid: Contains Petroleum Distillate It swallowed, do NOT cause vomiting. Call a physician immediately. Vomiting may cause asciration into lungs. If on skin, wash with soap and water. If irritation

develops, call a physician. alad, remove victim to fresh air. Call a physician. e of eye contact, flush with plenty of water for 15 inutes. Call a physician.

See side panel for additional precautionary statements.

EPA Reg. No. 8898-16 EPA Est. No. 8898-CA-2

Min. Net Gel.

(Liters)

Batch No.

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

7 88.97-16 Directio

To be used in governmental and by professional pest co This product is for control of floodwater areas and offer develop. It should be apply gal./acre or less. Under spec extremely dense vegetation content, rates to a maximum Petroleum oils may produce should not be used when the Avoid application to surface Use particular care to avoid areas containing fish or will

STORAGE A

Do not use, store, pour or excessive heat. If drum is the leak. Absorb spilled vermicutite and sweep up Prohibitions: Do not contaminate wate or disposal. Pesticide Disposal: Wastes resulting from the disposed of on site or all facility.

Container Disposal: Triple rinse for equivalent

or reconditioning, or pand a sanitary landfill, or by c state and local authoritie

BEST AVAILABLE COF

WITCO MAKES NO WARRANTY, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE CONCERNING THIS PRODUCT AND EXPRESSLY DISC LIABILITY FOR CONSEQUENTIAL OR INCIDENTAL DAMAGES, WHETHER BASED ON WARRANTY OR NEGLIGENCE. BUYER'S SOLE REMEDY SHALL BE REFUND OR REPLACEMENT.

Witco

Witco Corporation, Golden Bear Division P.O. Box 54 Oildale, CA 93388-5446 (80, 893-7110