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10163-169

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FILE COPY

301/5414596
301/5

02 OCT 1992

Ms. Anne Stout
Registration Specialist
Gowan Company
Post Office Box 5569
Yuma, Arizona 85366-9255

Dear Ms. Stout:

Subject: UPDATE LABELING TO REFLECT CURRENT
COMPANY OWNERSHIP for use
Imidian 70-WP Insecticide
EPA Registration Number 10163-169
Your Submissions Dated March 2 & 16, 1992

The Amended labeling referred to above, submitted in connection with registration under Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided the following label changes are made.

1). A statement of practical treatment, under the subheading "STATEMENT OF PRACTICAL TREATMENT" must be added to the front paneling, immediately below the ingredient statement of label. The statement should read as follows:

STATEMENT OF PRACTICAL TREATMENT

Call a Poison Center or a physician immediately if a known exposure occurs or is suspected and immediately start the procedures below. If further treatment is required contact a Poison Center, a physician, or the nearest hospital.

NOTE: Advise the person contacted that the active ingredient in this product is a cholinesterase inhibitor. Describe the type and extent of exposure, the victim's symptoms and follow the advice given.

NOTE TO MEDICAL PERSONNEL: Atropine by injection is antidotal for cholinesterase inhibition. Pralidoxime Chloride (2-PAM. Protopam) is also antidotal when administered early and in conjunction with atropine.

IF SWALLOWED: Immediately give several glasses of water and induce vomiting by placing a finger on the back of the victim's tongue. Give fluid until vomitus is clear. If victim is unconscious or convulsing, do not induce vomiting or give anything by mouth.

CONCURRENCES							
SYMBOL							
SURNAME	W. H. W. W.						
DATE	10.2.92						

IF INHALED: Remove to fresh air. If breathing is difficult, oxygen may be given with a physician's advice. If not breathing, clear victim's airway, start mouth-to-mouth artificial respiration and get medical attention.

IF ON SKIN: Flush affected areas with plenty of water for several minutes. Remove and clean contaminated clothing and shoes. Get medical attention if skin irritation occurs.

IF IN EYES: Hold eyelids apart and flush eyes with plenty of water. Get medical attention if eye irritation occurs.

2). In the environmental hazard section, replace the current statement regarding "wetlands" with the following:

Do Not Apply Directly To Water, To Areas Where Surface Water Is Present Or To Intertidal Areas Below The Mean High Water Mark."

3). On the front panel, the label must identify the purpose of the product and limit use to agricultural application, i.e.

IMIDAN 70 WP

Agricultural Insecticide-Wettable Powder

For Agricultural Use Only

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

A stamped copy is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure:

Imidan® 70-WP

Agricultural Insecticide

3 2 5
ACCEPTED
with COMMENTS
in EPA Letter Dated

02 OCT 1992

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

1063-169

Active Ingredient:

Phosmet: N-(mercaptomethyl)phthalimide, S-(O,O-dimethyl phosphorodithioate)..... 70%
Inert Ingredients:..... 30%
TOTAL..... 100%

KEEP OUT OF REACH OF CHILDREN WARNING-AVISO

Precaucion al usuario: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING-AVISO

HARMFUL OR FATAL IF SWALLOWED, INHALED, OR ABSORBED THROUGH THE SKIN.

Do not get in eyes or on skin, or on clothing. Do not breathe spray mist. In case of skin contact, wash immediately with soap and water.

Wash all contaminated clothing with soap and hot water before reuse.

NOTE TO PHYSICIAN: Imidan is an organophosphorus insecticide. Atropine is antidotal. 2-PAM also is antidotal when administered early, and in conjunction with atropine.

Store in a cool, dry place. Read all directions before using.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes.) Do not contaminate water by cleaning of equipment or disposal of wastes. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops while bees are actively visiting the treatment areas.

USE PRECAUTIONS

- Read all precautions and directions before using. Apply this product only as specified on this label.
- Do not contaminate food or feed.
- Imidan 70-WP is compatible with most commonly used insecticides and fungicides, but is incompatible with alkaline materials such as bordeaux or lime. The water in the spray solution must not have a pH of 7 or higher. The pH of the spray solution may be corrected by the addition of a suitable buffering or acidifying agent for optimum insecticidal activity.
- The addition of a spray adjuvant is not necessary or recommended with Imidan 70-WP.

SEE ATTACHED BOOKLET FOR DIRECTIONS FOR USE

NET WEIGHT _____ LBS.

Gowan Company

EPA Reg. No. 10163-169
EPA Est. No. 10163-AZ-1

P.O. Box 5569
Yuma, AZ 85366-5569

Imidan[®] 70-WP

Agricultural Insecticide

DIRECTIONS FOR USE

Gowan Company

P.O. Box 5569
Yuma, AZ 85366-5569

EPA Reg. No. 10163-169
EPA Est. No. 10163-AZ-1

DIRECTIONS FOR USE

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

REENTRY STATEMENT

Do not allow worker reentry into treated fields within 24 hours of application unless the appropriate protective clothing is worn. Protective clothing means, at least, a hat or other suitable head covering, a long-sleeved shirt and long-legged trousers or a coverall type garment (all closely woven fabric covering the body, including the arms and legs) shoes and socks.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers.

When oral warnings are given, warnings shall be given in a language customarily understood by workers and must indicate the specific period of time that treated areas may not be entered without protective clothing. Oral warnings must also include appropriate first aid instructions in case of accidental exposure: If swallowed, immediately give several glasses of water and induce vomiting by placing a finger on the back of the victim's tongue. Give fluids until vomitus is clear. If victim is unconscious or convulsing, do not induce vomiting or give anything by mouth. If inhaled, remove to fresh air. If breathing is difficult, oxygen may be given with a physician's advice. If not breathing, clear victim's airway and start mouth-to-mouth artificial respiration and get medical attention. If on skin, flush affected areas with plenty of water for several minutes. Remove and clean contaminated clothing and shoes. Get medical attention if skin irritation occurs. If in eyes, hold eyelids apart and flush eyes with large amounts of running water for 15 minutes. Get medical attention if eye irritation occurs.

Written warnings must include the following information: "WARNING. Area treated with Imidan Agricultural Insecticide on (date of application.) Do not enter treated areas without appropriate protective clothing within 24 hours of application (or other reentry interval if your state has a more restrictive interval for this product). If accidental exposure occurs, follow the instructions below: If swallowed, immediate-

ly give several glasses of water and induce vomiting by placing a finger on the back of the victim's tongue. Give fluids until vomitus is clear. If victim is unconscious or convulsing, do not induce vomiting or give anything by mouth. If inhaled, remove to fresh air. If breathing is difficult, oxygen may be given with a physician's advice. If not breathing, clear victim's airway and start mouth-to-mouth artificial respiration and get medical attention. If on skin, flush affected areas with plenty of water for several minutes. Remove and clean contaminated clothing and shoes. Get medical attention if skin irritation occurs. If in eyes, hold eyelids apart and flush eyes with large amounts of running water for 15 minutes. Get medical attention if eye irritation occurs."

PROTECTIVE CLOTHING

When mixing/loading wear mid forearm to elbow length chemical resistant gloves, long-sleeve shirt, and long pants. During the application, wear long-sleeve shirt and long pants. Applicator must also wear a wide-brimmed chemical resistant hat while spraying toward fruit and nut crops.

Any article of clothing worn while applying product must be cleaned before reusing. Clothing should be laundered separately from household articles. Clothing which has been drenched or has otherwise absorbed concentrated pesticide must be disposed of in a sanitary landfill, incinerated, or burned if allowed by State and local authorities.

Pour recommended amount of this material on surface of water in nearly filled spray tank. Add balance of water to fill tank. Keep agitator running during filling and spraying operations. Do not allow mixture to stand. Do not use gear-type spray equipment.

CHEMIGATION STATEMENT

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

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool dry place.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

RECOMMENDATIONS FOR USE

ALFALFA: For control of Common Alfalfa Weevil and Egyptian Alfalfa Weevil Larvae—Apply 1½ lbs. Imidan 70-WP in 10 to 50 gals. of water per acre (20 to 50 gals. water for dense stands) by ground equipment or 1½ lbs. Imidan 70 WP in 5 to 10 gals. of water per acre by aircraft. Consult your local County Agent or Extension Service Representative regarding the proper timing of application. Larvae should be sprayed when they are actively feeding. Do not apply more than once per cutting. Do not graze or cut for hay within 7 days after application.

POTATOES: Colorado Potato Beetle, Potato Flea Beetle, Potato Leafhopper (Not recommended for use on potatoes in California)—Apply 1½ lbs. per acre in sufficient water to provide good coverage. Repeat applications as necessary throughout the season. Do not apply within 7 days of harvest.

DECIDUOUS FRUITS—Foliar Sprays

APPLES: For Apple Maggot, Codling Moth, Elm Spanworm, Green Apple Aphid, Fruit Tree Leafhopper, Gypsy Moth, Plum Curculio, Red Banded Leafroller, Rosy Apple Aphid control, and Tarnished Plant Bug suppression, apply ¾ to 1 lb. per 100 gals. water (or a maximum of 5½ lbs. per acre per application) as a full cover spray. Use 1 lb. per 100 gals water for Plum Curculio. Repeat as necessary in accordance with insect infestation and local or state spray programs. Usually

suppresses European Red and Two Spotted Mites when used in a seasonal program. Do not apply within 7 days of harvest. Recommended for control of Elm Spanworm, Gypsy Moth and Fruit Tree Leafroller in the Northeast only.

APRICOTS, NECTARINES, PRUNES, PLUMS: Apple Maggot, Oriental Fruit Moth, Peach Twig Borer, Plum Curculio, Red Banded Leafroller—Apply $\frac{3}{4}$ to 1 lb. per 100 gals. water (or a maximum of 4 $\frac{1}{2}$ lbs. per acre per application) as a full cover spray. Use 1 lb. per 100 gals. water for Plum Curculio. Repeat as necessary in accordance with insect infestations and local or state spray programs. Usually suppresses European Red and Two Spotted Mites when used in a seasonal program. Do not apply to apricots or nectarines within 14 days of harvest; to prunes or plums within 7 days of harvest.

CHERRIES, SOUR (Tart): Cherry Fruitfly, Fruit Tree Leafroller, Peach Twig Borer, Plum Curculio—Apply $\frac{3}{4}$ lb. per 100 gals water (or a maximum of 2 $\frac{1}{2}$ lbs. per acre per application) as a full cover spray. Repeat as necessary in accordance with insect infestations and local or state spray programs. Usually suppresses European Red and Two Spotted Mites when used in a seasonal program. Do not apply within 7 days of harvest. Recommended for Cherry Fruitfly, Fruit Tree Leafroller and Plum Curculio in the Northeast only.

GRAPES: For control of Grape Leafhopper and Omnivorous Leafroller—Apply 1 $\frac{1}{2}$ lbs. Imidan 70-WP in 200 gals. water per acre. Spray both sides of each row, also tops of vines to assure adequate coverage of fruit and foliage. Applications may be made at any time between egg hatch and pupation. Do not apply within 7 days of harvest.

(Northeast only) Grape Berry Moth—Apply 2 to 2 $\frac{1}{2}$ lbs. of Imidan 70-WP in 200 gals. water per acre. Apply prebloom, post-bloom, 1st and later cover spray as needed. Grape Leafhopper—Apply 2 to 2 $\frac{1}{2}$ lbs. Imidan 70-WP in 200 gals. water per acre. Apply when most nymphs hatch. Generally coincides with Berry Moth. Make applications as necessary to maintain control in accordance with insect infestations and local or state spray programs. Do not apply within 14 days of harvest.

PEACHES: For Oriental Fruit Moth, Peach Twig Borer, Plum Curculio control and Tarnished Plant Bug suppression—Apply $\frac{3}{4}$ to 1 lb. per 100 gals water (or a maximum of 4 $\frac{1}{2}$ lbs. per acre per application) as a full cover spray. Use 1 lb. per 100 gals. for Plum Curculio. Repeat as necessary in accordance with insect infestations and local or state spray programs. Usually suppresses European Red and Two Spotted Mites when used in a seasonal program. Do not apply within 14 days of harvest.

PEARS: For Codling Moth, Elm Spanworm, Fruit Tree Leafroller, Green Apple Aphid, Gypsy Moth, Pear Psylla, Plum Curculio, Red Banded Leafroller, Rosy Apple Aphid control and Tarnished Plant Bug suppression—Apply $\frac{3}{4}$ to 1 lb. per 100 gals. water (or a maximum of 7 $\frac{1}{2}$ lbs. per acre per application) as a full cover spray. Use 1 lb. per 100 gals. water for Plum Curculio. Repeat as necessary in accordance with insect infestations and local or state spray programs. Usually suppresses European Red and Two Spotted Mites when used in a seasonal program. Do not apply within 7 days of harvest. Recommended for control of Elm Spanworm, Gypsy Moth and Fruit Tree Leafroller in Northeast only.

CONCENTRATE AND SEMI-CONCENTRATE FOLIAR SPRAYS (Air or Ground Equipment): When concentrate and semi-concentrate sprays are used, apply the recommended rate of Imidan 70-WP per acre in proportionately lower volumes of water according to equipment manufacturer's directions and state spray schedules. Do not exceed the maximum rate of Imidan 70-WP per acre or the time limitations specified above for the individual tree fruits. In California, use a minimum of 3 lbs. Imidan 70-WP per acre on mature pome and stone fruit trees (2 $\frac{1}{2}$ lbs. on cherries).

DECIDUOUS TREE FRUITS—Dormant Applications (Pacific Coast states only) Apples, Apricots, Cherries, Nectarines, Peaches, Pears, Plums, Prunes: San Jose Scale.

Apricots, Cherries, Nectarines, Peaches, Plums, Prunes: Peach Twig Borer.

Use $\frac{3}{4}$ lb. Imidan 70-WP per 100 gals. of water plus suitable spray oil according to oil manufacturer's specifications. Make thorough coverage using ground sprayers, wetting all parts of the tree.

ALMONDS—Dormant Application: San Jose Scale and Peach Twig Borer—Use $\frac{3}{4}$ lb. Imidan 70-WP per 100 gals. of water plus suitable spray oil according to oil manufacturer's specifications and local and state spray schedules. Make thorough coverage using conventional ground sprayers, wetting all parts of the tree.

DECIDUOUS SHADE AND ORNAMENTAL TREES AND WOODY EVERGREENS

NOTE: Limit all uses for control of Gypsy Moth, Elm Spanworm, and Birch Leafminer to the Northeastern U.S. only. Recommended for Spring Cankerworm in the Northeastern and Midwestern U.S.

Imidan 70-WP is recommended for use by commercial applicators on deciduous shade and ornamental trees and woody evergreens in parks, residential and recreational areas, along thoroughfares and other localized areas where infestations of Gypsy Moth, Spring Cankerworm, Elm Spanworm or Birch Leafminer occur.

- Recommended on **Deciduous Shade and Ornamental Trees** (such as Ash, Beech, Oak, Dogwood, Willow, Hickory, Locust, Hawthorne, Birch, Elm, Maple) to control Elm Spanworm, Spring Cankerworm, Gypsy Moth.

- Recommended on **Woody Evergreens** (such as Arborvitae, Cedar, Fir, Hemlock, Juniper, Pine, Spruce, Yew) to control Gypsy Moth.

- Recommended on **Birch Trees** to control Birch Leafminer. When such insects or their damage occur, apply at a rate of $\frac{3}{4}$ to 1 lb. Imidan 70-WP per 100 gals of water, thoroughly wetting all parts of the affected plants to the point of runoff. Repeat application as necessary to maintain insect control. Choose a cool, calm period, preferably in early morning or evening. Do not apply if rain is expected or before leaf surfaces are dry.

PINE SEEDLINGS (White, Slash and Loblolly): For control of pales weevil (*Hylobius pales*) and pitch-eating weevil (*Pachylobius picivorus*). Use Imidan 70-WP as a 4% top dip, dipping down to and including the root collar only. Dip in bundles loose enough to allow solution to penetrate the bundles. Avoid coverage of roots. Swish tops in solution for 10-15 seconds to assure adequate coverage of all top growth. Drain and allow seedlings to dry before planting. Agitate solution frequently to keep Imidan wettable powder in suspension. The addition of an extender such as NU-Film 17^s or Plantgard^s may help to retain the Imidan on the foliage under high rainfall conditions. Some slight needle burn and first year growth reduction may occur following treatment of loblolly pine. Wear rubber gloves during treating and planting.

DILUTION TABLE FOR A 4% TOP DIP

TO MAKE	5 gals.	30 gals.	50 gals.	100 gals.
Imidan 70-WP	2 $\frac{1}{2}$ lbs.	14 lbs.	24 $\frac{1}{2}$ lbs.	48 lbs.

Agitate frequently to keep Imidan in suspension. 5 gals. of solution should be enough to treat 10,000 seedlings. Do not keep Imidan solution overnight. Make up a fresh batch each day that seedlings will be dipped.

NOTICE ON CONDITIONS OF SALE

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.