

FILE

34615435874
1740

MAY - 4 1993

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

Dear Mrs. Stout:

Subject: Response to EPA Letter of August 11, 1992
Revised CSF and Up-Dated Labeling
IMIDAN Technical Organophosphorus Insecticide
EPA Registration Number 10163-172
Your Amended Application Dated February 9, 1993

The Amended labeling referred to above, submitted in connection with registration under Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is accepted. A stamped copy of the labeling is enclosed for your records.

With respect to comment #two (2) of our August 11, 1992 letter, we agree that state or regional limitations do not have to appear on the technical label since they appear on the end-use product. However, appropriate crop use limitations such as seed treatment must appear on the technical label.

In regard to the product chemistry data requirements, certain physical and chemical data such as Oxidizing/Reducing Action and Explodability remain outstanding (refer to EPA letter dated August 11, 1992, comment 2d). This information must be submitted and/or referenced to complete the product chemistry data requirements.

Sincerely yours,

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

~~Enclosure:~~

CONCURRENCES

SYMBOL	CC: Bridgid Lowery, SRRD					
SURNAME	AL					
DATE	5.4.93					

Imidan[®] TECHNICAL

ORGANOPHOSPHORUS INSECTICIDE

An Insecticide For Formulating Use Only

ACTIVE INGREDIENT:
 Phosmet 2-(3,4-dichlorophenyl)ethyl diethyl phosphorothioate
INERT INGREDIENTS: 2-(3,4-dichlorophenyl) phosphorothioate
 EPA Reg. No. 10485-172
 EPA Est. 10485-AL-1

% by wt.
 92.2
 7.8
 100.0%

Keep Out of Reach of Children WARNING

STATEMENT OF PRACTICAL TREATMENT

Call Poison Center or a Physician immediately if a known exposure occurs or if poisoning is suspected, do not wait for symptoms to develop. Immediately initiate the recommended procedures described below and simultaneously contact a physician, the nearest hospital or a Poison Control Center.

Inform the person contacted of the type and extent of exposure, describe the victim's symptoms and follow the advice given.

NOTE: Be sure to advise the physician that the compound is a cholinesterase inhibitor and follow the physician's advice.

NOTE TO PHYSICIANS: Exposure may cause cholinesterase inhibition. Atropine by injection is antidotal. 2-PAM is also antidotal when administered early and in conjunction with atropine.

If swallowed: Call a physician or Poison Control Center immediately. Immediately give large amounts of water and induce vomiting by gagging the victim with a finger placed on the back of the victim's tongue. Give fluids until vomiting is clear. Do not induce vomiting or give anything by mouth to an unconscious person.

If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen, preferably with a physician's advice.

If on skin: Remove contaminated clothing and shoes and immediately wash affected areas with soap and water. Get medical attention if irritation occurs. Wash clothing before reuse.

If in eyes: Hold eyelids apart and flush eyes with large amounts of running water for at least 15 minutes. Call a physician immediately.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9303.

For other product information, contact Gowan Company or see Material Safety Data Sheet.

See right panel for additional precautionary statements.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This pesticide is for the further manufacture of formulated insecticides only. Formulators using this product are responsible for obtaining EPA registration for their formulated products.

Only for formulation into an insecticide for the following uses:

(1) Allials	Berberis	Deciduous Shrub/	Nectarless	Plum
Almonds	Cherry	Ornamental Trees	Peaches	Potatoes
Apples	Citrus	Field Margins	Pears	Prunes
Apricots	Corn	Fruit Trees	Pears	Woody Evergreens
	Cotton	Grapes	Peanuts	

(2) Uses for which USEPA has accepted the required data and/or obtained data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with USEPA requirements.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

- May be harmful or fatal if swallowed, inhaled, or absorbed through the skin. Do not breathe dust or vapors.
- Causes eye irritation. Do not get in eyes, on skin, or clothing. Wash thoroughly with soap and water after handling and before eating or smoking. Wash all contaminated clothing with soap and hot water before reuse.
- When handling wear goggles, face shield, rubber gloves, and a NIOSH-approved respirator.
- Avoid contamination of food or feed.
- Mixers/loaders must wear goggles or a face shield, chemical-resistant apron, long-sleeved shirt and long pants or coveralls, and mid-forearm to elbow length chemical-resistant gloves when mixing, loading, or otherwise handling the concentrate.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without providing notice to the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

- Do not contaminate water, food or feed by storage or disposal.
- **STORAGE:** Store in a cool, dry, ventilated area.
- **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 liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.
- **SPILL OR LEAK:**
 - **Small Spills:** Wear all specified protective equipment. Sweep up spilled material. Place in an appropriate chemical waste container. Clean spill area with a detergent-water slurry. Absorb used slurry with a suitable inert absorbent such as clay. Place used absorbent in chemical waste container. Flush spill area with water. Observe all local, State, and Federal laws and regulations regarding spill, clean up, disposal, removal, or discharge.
 - **Large Spills:** In case of emergency, call collect day or night (800) 424-9303, CHEMTREC.

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 practices. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

This product is sold only for uses stated on its label. No express or implied license is granted to use or sell the product under any patent in any country except as specified. Country: United States of America

IMIDAN[®] is a trademark of an ICI Group Company

Net contents: 200 lb (90.7 kg)

Made in U.S.A.

Gowan

P. O. Box 5569
 Yuma, Arizona 85366

Gowan 01007

BEST AVAILABLE COPY



ACCEPTED
 with COMMENT
 by EPA Letter

MAY - 4 1987
 For the Federal
 Register and Rod
 is provided for the
 registered under EP
 10163-

FRANCE & ICI, INC.		(302) 671-TYPE
300 Canal Dr., Suite A-6, Wilmington, DE 19801		FAX (302) 671-0897
UNIT: WBS	VOLUME: 0200	GROUP: 02
FILE: 000001-02	ISSUE: 01-02	REV: 001