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10163 - 172

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United States Environmental Protection Agency

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Ms. Terre Farrell
Gowan Company
P.O. box 5569
Yuma, AZ 85366-5569

NOV 2 1999

Subject: Amendment adding uses on Imidan® Technical which currently exist on Prolate
Technical (10163-227)

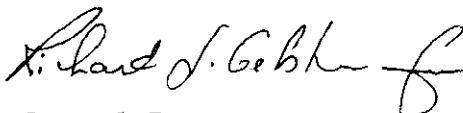
Registration Nos. 10163-172, and 10163-227
Product Name: Imidan® Technical and Prolate® Technical
Submission dated: February 5, 1999

Dear Mrs. Stout:

The labeling referenced above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

On July 7, 1997 the Agency, due to the evidence of misuse on cats and other domestic animals, notified the last end-use product registrant containing Phosmet as an active ingredient, to amend the label to state "INDOOR NON-FOOD USE AS A DIP, OR DUST ONLY ON DOGS": "DO NOT USE ON CATS OR OTHER COMPANION ANIMALS". There are currently no registered end-use products containing Phosmet for use on Cats or other companion animals other than dogs. Therefore the Imidan® Technical and Prolate® Technical (10163-227) labels must also delete cats as a use site from these label. In addition there are no active end use products for Phosmet as a pet collar. A notice of cancellation and amended labels for 10163-227 should be submitted to remove these current uses and existing language from the label. If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

enclosure
cc: 10163-172 file

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	Nov 2, 1999							

Imidan[®] Technical

ORGANOPHOSPHORUS INSECTICIDE

An Insecticide For Formulating Use Only

ACTIVE INGREDIENT:	% By Wt.
Phosmet: N-(mercaptomethyl)phthalimide	
S-(O, O-dimethyl phosphorodithioate).....	94%
INERT INGREDIENTS	6%
	Total 100%

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 PHYSICIAN: 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 vomitus 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.

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 a insecticide for the following uses:

- (1)
- | | | | |
|----------------------------|-----------------------|------------------|------------------|
| Alfalfa | Cotton | Nuts | Plums |
| Almonds | Crabapples | Ornamental Trees | Potatoes |
| Apples | Cranberries | Peaches | Prunes |
| Apricots | Deciduous Shade Trees | Pears | Sweetpotatoes |
| Blueberries | Field Margins | Peas | Tomatoes |
| Cherries | Fruit Trees | Pecans | Woody Evergreens |
| Christmas Tree Plantations | Grapes | Pine Seedlings | |
| Citrus fruits | Kiwi fruit | Pine Trees | |
| Corn | Nectarines | Pistachios | |

Indoor nonfood use as a dip, collar or dust on companion animals, cats and dogs.
Indoor food use as a dust bag, back rubber, dip, pour-on or spray on swine and livestock.

- (2) Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
(3) Uses for experimental purposes that are in compliance with USEPA requirements.

NET CONTENTS: 200 lb. (90.7 kg)

EPA Reg. No. 10163-172
EPA Est. No. 10182-AL-1



ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV - 2 1999

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

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, in the pesticide registered under EPA Reg. No. 10163-172
10163-227

**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. Mixer/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 previously notifying 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, cleanup, disposal, removal, or discharge.

Large Spills: In case of emergency, call collect day or night (800) 424-9300, CHEMTREC.

**FOR 24-HOUR EMERGENCY ASSISTANCE (SPILL, LEAK OR FIRE),
CALL CHEMTREC® (800) 424-9300.**

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

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.

IMIDAN® is a registered trademark of Gowan Company, LLC.

EPA Approved 07/23/97

EPA Text Pending: Imidan Technical (submitted to EPA 2-5-99)