

DEC 21 1984

Mr. E. O. Schneider
Makhteshim-Agan (America) Inc.
Two Park Avenue
New York, NY 10016

Dear Mr. Schneider:

Subject: Amendments - Update Labeling
Thionex (Endosulfan) Technical
EPA Registration No. 11678-5
Thionex (Endosulfan) 50% W.P.
EPA Registration No. 11678-24
Thionex (Endosulfan) 35 E.C.
EPA Registration No. 11678-25
Thionex (Endosulfan) 35% W.P.
EPA Registration No. 11678-26
Your submissions dated November 19, 1984

The amendments referred to above, submitted in connection with registrations under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. Note that this acceptance of updated labelling does not constitute a Notice of Reregistration for the subject products. A stamped copy of the label and associated technical bulletins THI-ATP/1 and THI-T for each product are enclosed for your records.

When preparing the actual finished labels, please be certain that no comma appears between "tree" and "fruit and nut crops". Also, delete the reference to bulletin THI-TOX found at the end of bulletin THI-T. The current labels do not refer users to the toxicology bulletin THI-TOX, which had been included with your earlier draft submissions of November 5, 1984. This toxicology bulletin must be revised to reflect the toxicology data generated by the endosulfan generic data development group, of which you are a member. It is especially important to reflect the toxic nature of endosulfan to birds and mammals in both general statements and specific acute toxicity values. The recommended precautionary text should be that accepted under these current labels. It is assumed that this revised toxicology bulletin will not be available until all the pertinent toxicology data has been reviewed and accepted by the Agency.

It should also be noted that the signal word for the 35 E.C. (and presumably the 35% W.P.) may have to be increased after the Agency has completed its evaluation of the product specific toxicology data which has recently been submitted by your company.

This also serves to acknowledge receipt of the Reregistration Data Compensation Statements (Appendix III-1 of the Endosulfan Registration Standard Guidance Package) for each of the subject products. While these satisfied requirements in effect when the Standard was issued, you must also submit the appropriate items as determined from PR Notice 84-4 to satisfy current data compensation procedures.

Sincerely yours,

George T. LaBocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767)

PRECAUTIONARY STATEMENTS

Hazards to Humans (& Domestic Animals)

POISON

Poisonous if swallowed, or absorbed through the skin. May be fatal if inhaled. Do not get in eyes, on skin or on clothing. Wear natural rubber gloves, protective clothing and goggles. In case of contact, wash immediately with soap and water. During manufacturing, wear a respirator jointly approved by the Mine Safety and Health Administration (MSHA) and the National Institute for Occupational Safety and Health (NIOSH) for pesticide application under the provisions of 30 CFR Part 11. Wash hands, arms and face thoroughly with soap and water before eating or smoking. Wash all contaminated clothing with soap and hot water before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this pesticide or its ingredients into lakes, streams, ponds, estuaries, oceans or public waters. If this product is specifically identified in an NPDES permit, do not discharge effluent containing this product into sewerage systems without providing notification to the Sewage District Authority. For guidance, contact your state water board or regional office of EPA.

DIRECTIONS FOR USE:

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

For the formulation of insecticides and acaricides for greenhouse use, tree, fruit and nut crops, field and vegetable crops, and domestic outdoor use only. Refer to technical bulletins TH-T, TH-ATF/1 and TH-ATF/2 for further information on specifications of Thionex (Endosulfan) Technical.

Formulators using this product are responsible for obtaining EPA Registration for their formulated product.

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Disposal:

Pesticide: Pesticide wastes are acutely hazardous. 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.

In case of minor spills, follow all precautions indicated above and cleanup immediately. Sweep up and dispose of wastes and broken or empty containers in a landfill approved for pesticide use.

Container: 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.

THIONEX (ENDOSULFAN) TECHNICAL

For the formulation of insecticides and acaricides only.

ACTIVE INGREDIENT:

Endosulfan (Hexachlorohexahydromethano-2,4,3-benzodioxathiepin 3-oxide) 95%

INERT INGREDIENTS: 5% Total 100%

KEEP OUT OF REACH OF CHILDREN

DANGER POISON

Statement of Practical Treatment

If swallowed - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If inhaled - remove from contaminated area and have patient lie down and keep quiet.

If on skin - remove contaminated clothing and wash skin immediately with soap and warm water.

If in eyes - wash with flowing water for at least 15 minutes.

See side panel for additional precautionary statements.

Notice to Physicians: Endosulfan is a central nervous system stimulant and may cause convulsions. There is no specific antidote. Barbituric acid derivatives may be used in treatment.

Warranty Statement:

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product contrary to label instruction or under abnormal conditions or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured by:

MAKHTESHIM CHEMICAL WORKS, LTD. c/o Makhteshim-Agan (America) Inc. 2 Park Avenue, New York, N.Y. 10016 EPA Reg. No. 11678-5 EPA Est. No. 11678-1S-01

RQ ENDOSULFAN NA 2761



ACCEPTED in EPA letter dated DEC 21 1984 Under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 11678-5