

441308  
PM 13 19713-104  
13 13 8

Ms. Barbara Brown  
Drexel Chemical Company  
P.O. Box 9306  
Memphis, TN 38109

MAY 14 1993

Dear Ms. Brown:

Subject: Amendment - Voluntary changes intended  
to reduce risks to birds  
Drexel Diazinon Technical  
EPA Reg. No. 19713-104  
Your submission dated October 2, 1992

The amendment referred to above, submitted in connection with a registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable provided the following revisions are made prior to release for shipment under the amended labeling:

- 1) Under the heading "ON THE FOLLOWING TERRESTRIAL FOOD CROPS", you may add the crop "Chinese broccoli" to appear directly after "broccoli".
- 2) Also under the heading "ON THE FOLLOWING TERRESTRIAL FOOD CROPS", revise the entry "Chinese cabbage (bok choy)" to "Chinese cabbage (bok choy and nappa)".
- 3) Due to the Agency's granting of a data waiver to permit use of a 24C for limited watercress acreage use in Hawaii only, you may add the following after the terrestrial crops entry:

**ON THE FOLLOWING AQUATIC FOOD CROPS:**  
watercress (Hawaii only)

- 4) Under the heading "IN TERRESTRIAL NON-CROP AREAS INCLUDING:", revise "barriers strips" to "barrier strips".
- 5) In the new paragraph following the use sites, i.e., "This product may be used to formulate end-use granular products...", revise the end of the first sentence to read "... to reduce risks to birds.", rather than "... to insure safety to birds."

- 6) In the Turf section, revise the heading for the avian precautions to read: "SPECIAL PRECAUTIONS TO REDUCE RISKS TO BIRDS". In this same section revise the first two sentences to read as follows:

"Birds, especially waterfowl (ducks or geese), feeding or drinking on treated areas may be killed. To reduce risks to birds:".

- 7) It would be beneficial if you could show the heading and text of the SPECIAL PRECAUTIONS TO REDUCE RISKS TO BIRDS within an outline box (as it appears on the latest labels for Ciba-Geigy's diazinon end-use granular products which incorporate avian risk reduction precautions) for both the turf section (heading plus introduction plus items a - g) and the vegetable and field crops section (heading plus introduction plus items a - b). This would not only provide appropriate highlighting of these precautions, but would also aid a formulator who might think that items 2 through 4 (Turf) and item 2 (Field and Vegetable crops) were part of the precautionary text rather than special instructions to aid formulators preparing their label directions.
- 8) Item "2" of the special precautions for use on turf would be clearer if you said "Granular formulations with greater than 5% active ingredient may not be use on turf.".
- 9) In the Vegetables and Field Crops section, add the heading for the avian precautions, "SPECIAL PRECAUTIONS TO REDUCE RISKS TO BIRDS". In this same section, revise the second sentence to read: "To reduce risks to birds:".

A stamped copy of the label is enclosed for your records. Please submit five copies of the revised amended label prior to release for shipment under the amended label. Please note that the Agency's acceptance of this label at this time does not preclude future label revision requirements or other regulatory actions by the U. S. Environmental Protection Agency in regards to avian risk reduction.

Sincerely,

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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

39

MAY 14 1993

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

19713-104

Drexel

**DIAZINON TECHNICAL**

An Insecticide for Manufacturing Use Only

**ACTIVE INGREDIENT:**

Diazinon (O,O-diethyl O-(2-isopropyl-6-methyl-4-  
pyrimidinyl) phosphorothioate) . . . . . 87.0%

**INERT INGREDIENTS:** . . . . . 13.0%

**TOTAL** . . . . . 100.0%

A stabilized Diazinon 8 lbs. per gallon oil concentrate.

**KEEP OUT OF REACH OF CHILDREN**

**WARNING/AVISO**

**PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals

**WARNING:** May be fatal if swallowed. May be absorbed  
through skin. Do not get in eyes, on skin or on clothing.  
Do not breathe vapors or spray mist. Do not wear  
contaminated clothing. Wash thoroughly after handling and  
before smoking or eating. Avoid contamination of food and  
feed.

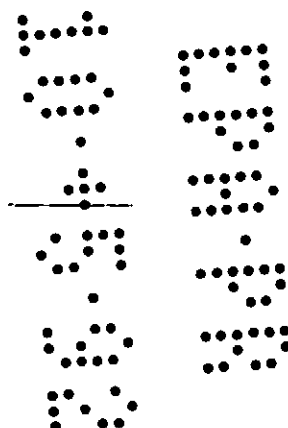
EPA REG NO 19713-104

EPA EST NO 19713-MS-1

10/01/92

MANUFACTURED BY:  
Drexel Chemical Company  
P.O. Box 7306  
Memphis, TN 38109

NET CONTENTS:



**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Call a physician or Poison Control Center immediately. Vomiting may cause aspiration pneumonia. Drink a large quantity of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person or a person who is convulsing.

**IF INHALED:** Remove victim to fresh air. If not breathing, apply artificial respiration, and get medical attention immediately. Do not apply mouth-to-mouth resuscitation if exposure was by swallowing.

**IF ON SKIN:** Wash promptly with soap and water. Remove contaminated clothing and launder before reuse. Contact a physician or Poison Control Center if symptoms of poisoning develop.

**IF IN EYES:** Rinse eyes with plenty of water and call a physician immediately.

**NOTE TO PHYSICIAN:** Diazinon is a cholinesterase inhibitor. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

**ENVIRONMENTAL HAZARD:** This pesticide is highly toxic to fish and wildlife. 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 to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

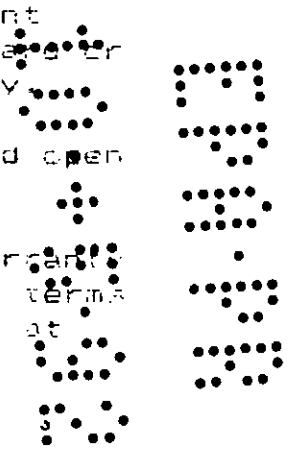
**PHYSICAL OR CHEMICAL HAZARDS:** Keep away from heat and open flames.

**IMPORTANT:** Read the entire Directions for Use and Warnings and Conditions of Sale before using this product. If terms are not acceptable, return unopened product container at once.

**DIRECTIONS FOR USE**

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

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



This product may be used only for the formulation of end-use insecticides for use:

**ON THE FOLLOWING AQUATIC FOOD CROPS:**  
watercress.

**ON THE FOLLOWING TERRESTRIAL FOOD CROPS:**

Almonds, apples, apricots, beans (succulent only) (including seed treatment), beets, blackberries, blueberries, boysenberries, broccoli, Brussels sprouts, cabbage, Chinese cabbage (bok choy), cantaloupe, carrots, Casaba melons, cauliflower, celery, cherries, cole crops, collards, red chicory (radicchio), corn (including seed treatment), cranberries, Crenshaw melons, cucumbers, dewberries, endive (escarole), eggplant, ginseng, grapes, honeydew melons, hops, kale, lettuce, lima beans (succulent only), loganberries, melons, muskmelons, mustard greens, Chinese mustard, nectarines, onions, parsley, parsnips, peaches, pears, peas (succulent only) (including seed treatment), peppers, Persian melons, pineapples, plums, potatoes, prunes, radishes, Chinese radishes, raspberries, rutabagas, snap beans, spinach, squash, strawberries, sugar beets, sweet potatoes, Swiss chard, tomatoes, turnips (including tops), walnuts, watermelons and zucchini.

**IN TERRESTRIAL NON-CROP AREAS INCLUDING:**

Uncultivated non-agricultural areas (including barriers strips, ditch banks, noncrop areas, roadsides and wastelands).

**INSIDE:**

Mushroom houses.

**ON:**

Ornamentals (including greenhouse) and lawns (excluding golf courses and sod farms).

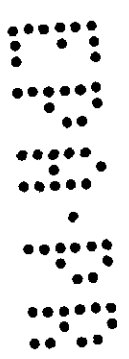
**INSIDE AND OUTSIDE:**

Domestic dwellings, commercial buildings, food/feed handling establishments, and animal quarters (excluding dairy barns, milk rooms, and poultry houses).

**AND ON THE FOLLOWING ANIMALS:**

Cattle (non-lactating), sheep, cats, and dogs.

This product may be used to formulate end-use granular products for use on vegetables, field crops, and turf only if the labeling for such end-use products include certain directions and precautions to insure safety to birds. This product may not be used to formulate end-use granular formulations of diazinon unless the labeling for the end-use product includes the following restrictions and directions.



Turf

- 1. The following precautions must appear in the directions for use:

SPECIAL PRECAUTIONS TO AVOID HAZARD TO BIRDS

Birds, especially waterfowl (ducks, geese) feeding or drinking on treated areas may be killed. To avoid hazard to birds:

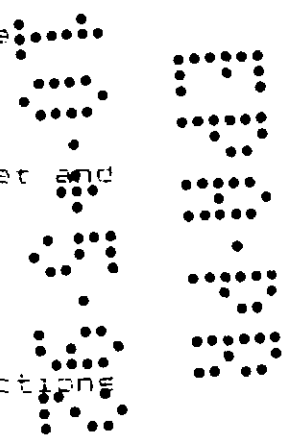
- a) Do not treat areas larger than 15,000 square feet.
  - b) Because of the migratory habits of certain waterfowl, do not apply in Nassau County, New York between November 1 and May 20.
  - c) Do not exceed maximum permitted label rates, since rates above those recommended significantly increase potential hazards to birds, especially waterfowl.
  - d) Avoid overlapping treated areas.
  - e) Follow all watering instructions included within the directions for use, however stop watering before puddling occurs.
  - f) Do not apply this product to sites occupied by waterfowl or to sites within 75 feet of any body of water that may attract waterfowl, such as lakes or ponds.
  - g) If necessary to repeat application, wait a minimum of 3 weeks between applications. Make no more than 4 applications per year.
- 2. Formulations with greater than 1% active ingredient may not be used on turf.
  - 3. The maximum use rate on turf is 4.3 pounds active ingredient per acre.
  - 4. For foundation band treatments around house foundations, the band must be no wider than 2 feet and the use rate no greater than 4.3 pounds active ingredient per acre.

Vegetables and Field Crops

- 1. The following precaution must appear in the directions for use:

Birds feeding on treated areas may be killed. To avoid toxicity to birds:

- a) Thoroughly incorporate this product into the soil during or immediately after application. Refer to the soil incorporation depth specified in the directions for use.



- b) Cover or incorporate spilled granules.
2. Aerial and unincorporated application of granules is not permitted.

**DREXEL CHEMICAL COMPANY** recommends this product only for the uses cited above and makes not warranty, expressed or implied, with respect to experimental uses and disclaims all liability for damages attributable to such experimental uses.

**STORAGE INSTRUCTIONS**

Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Avoid storage at high temperatures. Do not move containers from one area to another unless they are securely sealed. Keep containers tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed, and fertilizer to avoid cross-contamination. Avoid contamination from water, acids, or alkalis. store in original container only. If the contents are leaking or material is spilled follow these steps:

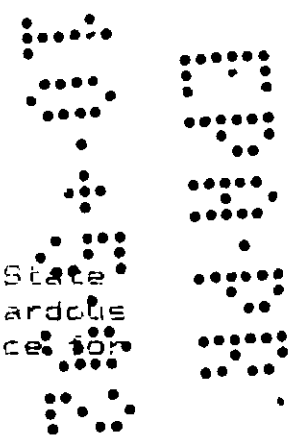
- 1. Contain spill, absorb with a material such as saw dust, clay granules or dirt.
- 2. Collect and place in suitable containers for disposal.
- 3. Wash area with water and soap to remove remaining pesticide.
- 4. Follow washing with clean water rinse.
- 5. Do not allow runoff to enter sewer or contaminate water supplies.
- 6. Dispose of waste as indicated below.

**PESTICIDE DISPOSAL**

Pesticide wastes are toxic. Improper disposal is a violation of Federal law. If pesticide or equipment rinsates cannot be used according to formulation instructions or chemically reprocessed, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL**

Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.



**WARRANTY - CONDITION OF SALE:**

Drexel warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the directions for use. Drexel makes no other warranties, express or implied, including FITNESS or MERCHANTABILITY. In no case shall Drexel or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.

5 2  
4 3  
3 2  
2 1  
1 0