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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 10 1994

BARBARA BROWN  
DREXEL CHEMICAL COMPANY  
BOX 9306  
MEMPHIS, TN 38109

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 10/12/93 Response to PR Notice 93-7  
EPA Reg. No. 19713-288  
CYTHION ULV CONCENTRATE INSECTICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

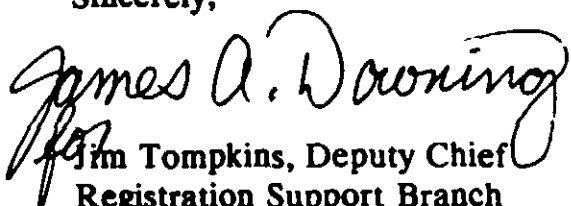
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,

  
Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Office of Pesticide Programs**  
**Registration Division**

Barbara Brown  
DREXEL CHEMICAL CO  
BOX 9306  
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-288  
CYTHION ULV CONCENTRATE INSECTIC: E

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing."

Remove the statement "Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

DREXEL

MALATHION ULV CONCENTRATE

PREMIUM GRADE INSECTICIDE

ACTIVE INGREDIENTS:

Malathion* . . . . .	.95.0%
INERT INGREDIENTS: . . . . .	5.0%
TOTAL: . . . . .	100.0%

\*O,O-dimethyl dithiophosphate of diethyl mercaptosuccinate  
(One gallon contains 9.7 pounds of Malathion)

KEEP OUT OF REACH OF CHILDREN

WARNING/AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**STATEMENT OF PRACTICAL TREATMENT**  
**IF SWALLOWED:** Do not induce vomiting. Get medical attention.  
**IN CASE OF CONTACT:** Immediately flush eyes and skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician. Wash clothing before reuse.  
**NOTE TO PHYSICIAN:** Malathion may cause cholinesterase inhibition. Atropine is antidotal. 2-PAM may be effective as an adjunct to atropine.  
**MALATHION IS AN ORGANOPHOSPHATE INSECTICIDE/MITICIDE.**

EPA REG. NO. 19713-288  
EPA EST. NO. 19713-GA-1

MANUFACTURED BY:  
DREXEL CHEMICAL CO.  
P.O. BOX 9306 \* MEMPHIS, TN 38109

WPS DELETIONS/REVISIONS 10/93

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

1000 1001  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
19713-288

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**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist. Causes eye irritation. Do not get in eyes, on skin, or on clothing. ~~Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.~~

~~Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.~~

**PERSONAL PROTECTIVE EQUIPMENT**

Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS**

User should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to bees exposed to direct treatment or to residues on crops. Protective information may be obtained from your Cooperative Agricultural Extension Service.

This product is toxic to fish, shrimp, and crabs. For terrestrial uses, do not apply directly to water or areas where surface water is present, or to intertidal areas below the mean high water mark. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use, pour, spill or store near heat or open flame.

**DIRECTIONS FOR USE**

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

~~For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.~~

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**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

Coveralls  
Waterproof gloves  
Shoes plus socks

**MALATHION ULV CONCENTRATE** can be effectively applied with conventional aircraft spray equipment by making a few minor modifications in the plumbing and boom assembly.

**PUMP:** Pumps capable of producing pressures of 40 to 50 psi will be satisfactory. A bleed line at least 3/16 inch in diameter should be installed on the high point of the impeller chamber to release trapped air. This line should bleed back to the top of the tank above the liquid level.

**BY-PASS:** A by-pass is required from the spray pump outlet to the spray pump inlet. This line must be equal in diameter to the pump outlet and should contain a valve controllable from the cockpit that will permit adjustments of boom pressure in flight. The by-pass commonly used to recirculate **MALATHION ULV CONCENTRATE** to the spray tank must be closed to avoid aeration of the insecticide.

**BOOM AND NOZZLE PLACEMENT:** The distance the left and right outboard nozzles should be at least 3/4 of the wing span. The total number of nozzles used should be equally spaced across the span if the aircraft is flown at twenty feet or higher. Trailing edge booms are desirable and the nozzles should be placed on boom where pilot can readily see them to check any plugging of nozzles

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during spray operation. A bleed line at least 3/16 inch in diameter should be attached to the outer end of each boom and routed back to the top of the spray tank but above the liquid level. This line will bleed off pressure and assure sharp cut-off. If a nozzle is placed at each end of boom as many Ag Cat spray booms are assembled, this bleed line is not necessary.

**NOZZLES:** Use at least 4 to 6 flat fan nozzles, such as Spraying System 8001, 8015 or 8002 for small aircraft such as Piper Pawnees and Stearmans. For aircraft operating at 150 mph or faster, use 10 to 14 8010 or 8015 flat fan nozzles. Nozzles should be pointed straight downward on small aircraft and straight back for faster aircraft. Use 100 mesh screens with 8001, 8015 and 8002 nozzles and a large-volume 50 mesh screen should be used in spray systems. No screens are required for the 8010 or 8015 nozzles. Diaphragm check valves should be used in each nozzle to insure positive cutoff spray during flight. Do not use cone nozzles. Rotary atomizers, commonly known as Mini-Spin nozzles, developed by the Plant Pest Control Division, USDA, can be substituted for the flat fan nozzles. Use the same flat fan nozzle tips as mentioned above when using the Mini-Spin nozzles.

**MALATHION ULV CONCENTRATE** is used undiluted for ultra-low volume aerial applications to control adult corn rootworm, beet leafhopper, blueberry maggot, cereal leaf beetle, cotton boll weevil, flies, grasshoppers and mosquitoes as specified below. Aerial application should be made at altitudes of 20 to 25 feet.

**NOTE:** MALATHION ULV CONCENTRATE may cause spotting on automobile paint finish if prolonged exposure is permitted. Cars should not be sprayed directly. If accidental exposure does occur, the car should be washed immediately.

**ALFALFA, CLOVER, COTTON, PASTURE AND RANGE GRASS, GRASS AND GRASS HAY, AND NON-AGRICULTURAL LANDS (wastelands, roadsides, soil bank lands):** For control of grasshoppers--apply 8 fluid ounces of MALATHION ULV CONCENTRATE per acre. Repeat applications as necessary.

On alfalfa, clover, pasture and range grass, grass and grass hay--may be applied on day of harvest or grazing. Do not apply to alfalfa and clover in bloom.

**BLUEBERRIES: (Grown in Michigan and Indiana):** For control of blueberry maggot on blueberries--apply 10 fluid ounces of MALATHION ULV CONCENTRATE per acre. Apply uniformly and repeat application as necessary. No waiting period is necessary between last application and harvest.

**GRASSES:** For control of cereal leaf beetle on grasses--apply 8 fluid ounces of MALATHION ULV CONCENTRATE when adult beetles become active in the Spring. Repeat application within 7 to 14 days for control of adults and young larvae. Make no application on cereal crops within 7 days of harvest or forage use. On grasses, may be applied on day of harvest or grazing.

**CORN:** For control of adult corn rootworm on corn--apply 4 fluid ounces of **MALATHION ULV CONCENTRATE** per acre. Repeat application as necessary. Make no application on corn within 5 days of harvest or forage use.

**ALFALFA, CLOVER, PASTURE AND RANGE GRASS, GRASS AND GRASS HAY, BEANS, RICE, AND NON-AGRICULTURAL LANDS** (wastelands, roadsides, soil bank lands): Adult Mosquitoes and Flies--apply **MALATHION ULV CONCENTRATE** at the rate of 2 to 4 fluid ounces for control of adult mosquitoes and at 6 to 8 fluid ounces per acre for control of adult flies. Repeat applications as necessary.

On alfalfa, clover, pasture and range grass, grass and grass hay-- may be applied on day of harvest or grazing. Do not apply to alfalfa and clover in bloom. On corn--make no application within 5 days of harvest or forage use; on rice-- within 7 days of harvest; on beans and tomatoes--within 1 day of harvest.

**NON-AGRICULTURAL LANDS:** For control of beet leafhopper on wild host plants--use 8 fluid ounces of **MALATHION ULV CONCENTRATE** per acre. (Consult State Agricultural Authorities for proper timing of sprays).

Before using **MALATHION ULV CONCENTRATE** for the preparation of malathion insecticides, manufacturers should consult **DREXEL CHEMICAL COMPANY** for manufacturing and handling instructions.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**STORAGE INSTRUCTIONS**

Storage should be under lock and key in a ventilated room and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Do not stack over 2 pallets high. Move containers by handles or cases. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed, and fertilizer to avoid contamination. Store in original containers 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. Place a leaking container in a plastic tub and transfer contents as soon as possible to an empty original container.
6. Do not allow run off to enter sewer or contaminate water supplies.
7. Dispose of waste.

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**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**

**METAL CONTAINERS:** 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.

**GLASS CONTAINERS:** Triple rinse (or equivalent). Then dispose of in a sanitary landfill or by other approved state and local procedures.

**PLASTIC CONTAINERS:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**WARRANTY AND CONDITION OF SALE**

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

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 when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.