

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

SEP 25 2003

Ms. Luz G. Chen Registration Manager Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327

Dear Ms. Chen:

Subject:

Updated First Aid Statements Green Devil Spray Concentrate EPA Reg. No. 19713-304

Your Application of June 25, 2003

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you:

Submit two copies of your final printed label incorporating the following corrections before you release the product for shipment.

- 1. Revise the newly added spillage cleanup instructions by providing instructions for collecting the spilled pesticide and waste, i.e. use of absorbent material such as clay, sand and/or sawdust and instructions to use the PPE cited on the label when cleaning up any spills.
- 2. Either delete the entire statement, "Observe all precautions and notes." or revise it by removing the reference to notes and expanding it to include restrictions and directions. There are no "notes" on the label directed to the user of the product.

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended label constitutes acceptance of this condition.

ACCEPTED
with COMMENTS
in EPA Letter Dated:



SEP 2 5 2003

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

19713-304

Green Devil Spray

Contains 50% Malathion

Controls Aphids, Red spider mites and Scale on azaleas, camellias and other flowers and shrubs.

ACTIVE INGREDIENT:

Malathion*	50.0%
OTHER INGREDIENTS**:	
TOTAL:	

This product contains 4.35 pounds of active ingredient per gallon. *O,O-dimethyl phosphorodithioate of diethyl mercoptosuccinate. **Contains Aromatic petroleum derivative solvent.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-304 EPA Est. No. 19713-MS-1

Net Contents:

FIRST AID

IF SWALLOWED:

- Immediately call a poison control center or doctor.
- Do not induce vomitting unless told to do so by a poison control center or doctor.
- · Do not give any liquid to the person.
- . Do not give anything by mouth to an unconscious or convulsing person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this posticide product, including health concerns, medical emergencies or posticide incidents, call the National Pesticide Information Center at 1-800-858-7378.

NOTE TO PHYSICIAN: Malathion may cause cholinesterase inhibition. Atropine (1/100 grain tablets) is antidotal. Contains petroleum distillate vomiting may cause aspiration pneumonia.

MALATHION IS AN ORGANOPHOSPHATE INSECTICIDE/MITICIDE.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals
CAUTION: Harmful if swallowed. Avoid breathing of spray. Do
not take internally. Avoid contact with skin and eyes.
PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category "G" on an EPA chemical resistance category selection chart. Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves such as Barrier Laminate or Viton and shoes plus socks.

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

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. 3) As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates and aquatic life stages of amphibians. 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. Drift and runoff may be hazardous to aquatic organisms in areas near the application site. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. 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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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, greenhouses and handlers of agricultural restricteds. 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), restricted entry interval (REI) and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval 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, chemical-resistant gloves such as Barrier Laminate or Viton, and shoes plus socks.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to users of this product that are NOT within the scope of the Worker Protection Standard (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, foreats, nurseries or greenhouses. Do not allow contact with treated surfaces until approvs have dried.

Read entire label. Observe all precautions and notes. Spray infested plants thoroughly; be sure to wet the underside of learnes. Repeat as often as necessary for good control.

Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 30113-3027

ORNAMENTALS			
Plants	Disease	Rate per Gal. Water	
Azaleas, Camellias, Chrysanthemum, Evergreens, Roses, Stocks, (and many other flowers and shrubs)	Aphids	1.5 to 2 teaspoons	
	Bagworms, Japanese beetle adults, Mealybugs, Red spider mites, Rose leafnopper, Thrips, Whiteflies, Wooly aphids	1 tablespoon	
	Black scale, Oyster shell scale, Soft brown scale, (and certain others)	1.5 to 2 tablespoons	

USE INSTRUCTIONS: Mix recommended rate with 1 gallon of water. Do not use on Boston, Maidenhair and Pteris fems and some species of Crassula.

VEGETABLES			
Crop	Disease	Rate per Gal. Water	
Beans, Broccoli, Brussels sprouts, Cabbage, Cauliflower, Kale, Peas, Potatoes	Aphids	1.5 to 2 tablespoons	
	Bean leafhoppers Japanese beetle adult, Mealybugs, Red spiter mite, Thrips, Tomato leafhopper, Whitefiles	1 tablespoon	

USE INSTRUCTIONS: Mix recommended rate with 1 gallon of water. Do not apply to Beans within 1 day of harvest. Do not apply to Broccoli and Peas within 3 days of harvest. Do not apply to Brussels sprouts, Cabbage, Cauliflower or Kale within 7 days of harvest. Grazing or feeding of treated crop foliage by livestock for Beans and Peas (vines/forage and straw/hay) is prohibited.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. PESTICIDE STORAGE: 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 stack over 2 pallets high. 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. Collect and place in suitable containers for disposal.
- Wash area with soap and water to remove remaining pesticide.
- 3. Follow washing with clean water rinse.
- 4. Do not allow runoff to enter sewer or contaminate water supplies.
- 5. Dispose of waste as indicated below:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved disposal facility. CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning or dispose of in a sanitary landfill or by incineration if allowed by State and Local authorities.

WARRANTY—CONDITIONS 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 the Manufacturer 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 the Seller and is accepted as such by the Buyer.