

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

NOV - 7 2001

Ms. Luz Piwonka Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327

Dear Ms. Piwonka:

Subject: Amendment - Comply with 2000 Diazinon MOA;

Update First Aid per PR Notice 2001-1;

Delete Indoor Uses; and

Update CSF/replacement diazinon source

Southland Pearson & Company Bug Spray

Contains Diazinon and Pyrethrins [OLD NAME]

Drexel Bug Spray Contains Diazinon

and Pyrethrins [NEW NAME]

EPA Registration Number 19713-317

Your submissions dated May 8 and May 17, 2001

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

- 1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
- 2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
  - a. On the front panel revise "FOR USE AROUND THE HOME ONLY" to read "FOR USE AROUND THE OUTSIDE OF THE HOME ONLY".
  - b. Under the heading DIRECTIONS FOR USE, after the sentence beginning "It is a violation of Federal law..." add "Reformulation or repackaging of this product is prohibited.".

c. In the First Aid section, add an If Inhaled section as follows (format to match existing chart):

If Inhaled Move person to fresh air

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible

Call a poison control center or doctor for further treatment advice.

- 3. Submit three (3) copies of your final printed labeling before you release the product for shipment.
- 4. Comply with all applicable provisions of the 2000 Memorandum of Agreement Regarding Pesticide Products Containing Diazinon (i.e., the Diazinon MOA). In accordance with the Diazinon MOA you have requested the following revisions to the conditions of registration for this diazinon product with outdoor non-agricultural (i.e., home and garden) uses:
  - a. You have requested under section 6(f) of FIFRA that this registration be voluntarily canceled on a date not later than December 31, 2004.
  - b. You may not manufacture, label, or release for shipment this product after June 30, 2003.
  - c. You may not sell or distribute this product after August 31, 2003.
  - d. The registration for this product shall expire and be canceled on December 31, 2004.
  - e. You will send to every person who directly purchases this product (i.e., to every seller) a notification of Product Recovery Program to be conducted by Syngenta and Makhteshim after December 31, 2004.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

The Agency's records will be adjusted to reflect the change in the master name of record as follows:

Southland Pearson & Company Bug Spray Contains Diazinon and Pyrethrins [OLD NAME]

Drexel Bug Spray Contains Diazinon and Pyrethrins [NEW NAME]

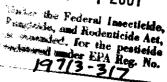
The Basic Confidential Statement of Formula (CSF) dated May 17,2001, and which identifies your replacement diazinon source Manufacturing Use Product, is acceptable and has been added to this product's registration file.

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Sincerely,

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

ACCEPTED with COMMENTS
EPA Letter Dated:
NOV - 7 2001





# PRESSURIZED INSECTICIDE FOR USE IN LAST AROUND THE HOME ONLY

#### **BUG SPRAY**

#### CONTAINS DIAZINON AND PYRETERINS

#### KILLS

ANTS, COCKROACHES, FLIES, SPIDERS, MOSQUITOES, SILVERFISH, BROWN DOG TICKS, CRICKETS, EARWIGS, SOWBUGS, FLYING MOTHS, WASPS, AND OTHER INSECTS AS SPECIFIED IN LABEL DIRECTIONS

### ACTIVE INGREDIENTS:

| TOTAL  |        |
|--|--------|
| OTHER INGREDIENTS: **                          | 9.325% |
| 4-pyrimidinyl) phosophorothioate]              | 0.500% |
| Diazinon [0,0-Diethyl 0-(2-isopropyl-6-methyl- |        |
| Technical Piperonyl Butoxide*                  | 0.125% |
| Pyrethrins                                     | 0.050% |

\*Equivalent to 10% of (butylcarbityl) 6-propyl piperonyl) ether and .025% of related compounds.
\*\*Contains petroleum distillates.

# KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID ON PACE 2.
SHAKE WELL BEFORE USING

EPA REG. NO. 19713-317 EPA EST. NO. 19713-GA-1

NET CONTENTS:



317 Draft: MOA

#### FIRST AID

This product contains diazinon, an organophosphate insecticide that inhibits cholinesterase.

## if swallowed Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. · Do not induce vomiting unless told to do so by a poison control center or doctor. • 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 15-20 minutes. Remove contact ienses, 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 15-20 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 pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Telecommunications Network at 1-800-858-7378.

#### NOTE TO PHYSICIAN

This product contains diazinon, an organophosphate that inhibits cholinesterase. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal, but should be administered only in conjunction with atropine.

Swallowed

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of food or feed. Do not use on household pets or humans. Remove pets from area, and cover fish bowls before spraying. Do not allow children or pets in treated areas until sprayed surfaces have dried.

#### **ENVIRONMENTAL HAZARDS**

This pesticide is highly toxic to birds, fish, and other wildlife. Birds feeding or drinking on treated area may be killed. Keep out of lakes, streams, ponds, tidal marshes and estauries. Do not apply directly to water, or wellands (swamps, languages). Do not contaminate water by disposal.

This pesticide is highly toxic to bees exposed to direct treatment or to residues on blooming plants where they feed. Do not allow this pesticide to drift to blooming plants if bees are visiting the treatment area. Do not apply this product to or allow it to drift to food crops or any desirable vegetation at any time.

#### PHYSICAL OR CHEMICAL HAZARDS

Extremely flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. exposure to temperatures above 130°F may cause bursting.

#### STORAGE AND DISPOSAL

STORAGE: Keep away from fire, sparks, and heat. See Physical or Chemical Hazards for additional precautions. Store in an area inaccessible to children and pets.

DISPOSAL: Do not reuse empty container. Do not puncture or incinerate container. Wrap container and put in trash collection.

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DIRECTIONS FOR USE

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

#### GENERAL INFORMATION

BUG SPRAY is a ready-to-use product in a ready-to-use pressurized container. Hold the container upright and lightly spray surfaces until wet, according to the directions for use. This product may be used inside the home for control of the pests specified on this label.

#### OUTDOOR USE

Controls

Flies, Mosquitoes, Wasps, Flying Moths, Chiggers, Ants, Brown Dog Ticks, Clover Mites

Precautions: (1) Spray with wind to your back. If clothing becomes wet from spray during use, remove clothing after spraying, wash affected body areas thoroughly with soap and water, and launder clothing before wearing again. (2) Do not allow children or pets to contact treated areas until spray has dried. (3) Do not apply to lawns or other desirable plants.

#### Application

Flies, Mosquitoes, Wasps, Flying Moths: For outdoor use only as an aid in reducing annoyance from these insects. Spray outside surface of screens, doors, window frames or wherever these insects may enter. Treat dark corners and localized resting areas, under eaves, on porches, around patios, and garages. Repeat as necessary. Also treat surfaces around light fixtures on porches, in garages, and other places where these insects alight or congregate.

Chiggers, Ants, Brown dog ticks, Clover mites: For treatment of localized infestations of insects in outdoor areas, spray infested areas. Do not apply to lawns or other desirable plants. For ants, wet hills and runways. Repeat as necessary.

Porches, Patios, Garages, and other areas around the house where insects hide and congregate: To help keep flies, mosquitoes, wasps, and flying moths from entering the house, treat ou:door areas where these insects congregate. This treatment can be an effective addition to total pest control.

#### CONDITIONS OF SALE AND WARRANTY

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Drexel Chemical Company or the Seller. All such risks shall be assumed by the Buyer.

Drexel Chemical Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. DREXEL CHEMICAL COMPANY MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL DREXEL CHEMICAL COMPANY OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. Drexel Chemical Company and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of Drexel Chemical Company.