

19713-319

01-22-2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

JAN 22 2009

Dear Ms. Chan:

Subject: Amendment – Revise Label per label table received with DCI dated February 4, 2008
Drexel Endosulfan Technical
EPA Reg. No. 19713-319
Your submission dated October 8, 2008

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) section 3(c)(7)(a), is acceptable provided the following revisions are incorporated before you release the product for shipment under the amended label:

1. In the fourth sentence of the Hazards to Humans and Domestic Animals text, revise "breath" to read "breathe".
2. In the Environmental Hazards there should only be a single paragraph. Delete from "Do not apply..." to "...wash waters or rinsate" (which actually pertains to application of end-use products). Thus, the remaining paragraph will begin "This product is extremely toxic to fish and aquatic invertebrates and toxic to birds and mammals." then continue with the rest of the paragraph beginning "Do not discharge effluent...." through "...Office of the EPA".

A stamped copy of the label is enclosed for your records. Please submit three copies of the amended labeling bearing the above revisions before you release the amended label for shipment. Please note that acceptance of this amendment does not constitute reregistration of the subject product.

Sincerely,

Dana R. Pilitt

fa Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division (7505P)

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 22 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
19713-319

Drexel

Endosulfan Technical

Insecticide

For the Manufacture of Insecticides and Acaricides Only.

ACTIVE INGREDIENT:

Endosulfan* 95.0%

OTHER INGREDIENTS: 5.0%

TOTAL: 100.0%

*Hexachlorohexahydromethano-2,4,3-benzodioxathiepin-3-oxide

KEEP OUT OF REACH OF CHILDREN

DANGER  **PELIGRO**
POISON **VENENO**

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.)

See **FIRST AID** Below

EPA Reg. No. 19713-319

EPA Est. No. 19713-MS-1 Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have 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 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.

IF ON SKIN OR CLOTHING:

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

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.

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 Information Center at 1-800-858-7378.

NOTE TO PHYSICIAN: Endosulfan is a central nervous system stimulant absorbable by mouth, inhalation or through contact with skin. It may cause convulsions. There is no specific antidote. Diazepam I.V. is the drug of choice. Barbituric acid derivatives such as Phenobarbital may be used additionally. A neuromuscular blocking agent may be used if convulsions persist. This type of drug may be used only if complete control of respiration can be maintained. Epinephrine derivatives are absolutely contraindicated. Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Fatal if swallowed or inhaled. May be fatal if absorbed through skin. Causes moderate eye irritation. Do not breath dust or vapors. Do not get in eyes, on skin, or on clothing. During formulating or loading operations, wear clean synthetic rubber gloves, protective

(Continued)

PRECAUTIONARY STATEMENTS (Cont.)

clothing (such as coveralls, socks and shoes), protective eyewear and a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter. Wash the outside of gloves before removing. Wash hands, arms, and face thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wash all contaminated clothing with soap and hot water separately from other laundry before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates and toxic to birds and mammals. Do not apply directly to water, or to 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 water adjacent to treated areas. See Spray drift management instructions under "Directions for use. Do not contaminate water when disposing of equipment wash waters or rinsate."

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

Formulator Information: Formulators using this product are responsible for obtaining EPA registration for their formulated products.

Formulators are encouraged to contact Drexel Chemical Company for the Endosulfan Technical MSDS, which contains the chemical and physical data for the technical.

THIS PRODUCT IS TO BE USED SOLELY FOR FORMULATION INTO end-use products for use on commercial agricultural crops and for outdoor commercial production of ornamental trees and shrubs. Do not use or formulate this product into any products in the form of a fogger, impregnated materials, insecticidal smoke, dust, pressurized liquid (i.e., spray cans - but not including EC or WP formulations applied by pump sprayers) or aerosol spray designed to automatically release the contents. The commercial use categories and formulation restrictions are described below.

DO NOT USE THIS PRODUCT TO FORMULATE END-USE PRODUCTS FOR:

- Any use in or around a structure used as a residence or domestic dwelling, or on any articles or areas associated with such structures (including household contents, home gardens, and greenhouses); or
- Any use in the form of a fogger, impregnated material, insecticidal smoke, dust, pressurized liquid or spray (i.e. spray cans - but not including EC or WP formulations applied by pump sprayers) or aerosol spray inside a commercial greenhouse or public or private building or structure (including recreational facilities, theaters, hotels, resorts, or other buildings used for public accommodation, or any other commercial, industrial or institutional building), or any articles or areas associated with such

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

ENDOSULFAN TECHNICAL

structures, including building construction and landscaping (but not including outdoor commercial ornamental tree and shrub production areas).

- c) Wettable powder products for use on the following crops: Beans (dry), Carrots, Cotton, Peas (dry), Pineapple, Sweet corn, Sweet potatoes, Tobacco, and Tomatoes.

ONLY FOR FORMULATION INTO AN INSECTICIDE FOR THE FOLLOWING USES:

Outdoor Fruit and Nut Crops

Almonds, Apples, Apricots, Blueberries, Cherries, Citrus (non-bearing trees and nursery stock), Filberts, Nectarines, Peaches, Pears, Pineapples, Plums, Prunes, Strawberries, and Walnuts.

Field and Vegetable Crops

Beans, (dry), Broccoli, Brussels sprouts, Cabbage, Carrots, Cauliflower, Celery, Collards, Corn (sweet corn, fresh vegetable use only), Cotton, Cucumbers, Eggplants, Kale, Lettuce, Melons (all), Mustard greens, Peas (dry), Peppers, Potatoes, Pumpkins, Squash (summer and winter), Sweet potatoes, Tobacco, Tomatoes, and Turnips.

Commercial Greenhouse Use

Tomatoes

Ornamental Trees and Shrubs

(Commercially Grown Outdoors Only)

Dogwood, Douglas fir (grown for ornamentals, nursery stock or Christmas trees - Pacific Northwest only), Leatherleaf fern, Lilac, Pines (Austrian, Jack, Red, Scotch, White), Shade trees (except Birch), Shrubs, Spruce (New England area only) and Taxus.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group or grower has complied with U. S. EPA data submission requirements regarding the support of such use(s).

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in tightly capped original containers only. Store in a cool, dry, well-ventilated place and avoid excess heat.

Carefully open containers. After partial use, replace lids and close tightly. The solid technical is sensitive to moisture, acids and bases. Decomposition will generate sulfur dioxide and endosulfan alcohol. Care should be exercised by workers entering the storage area since there is the possibility that sulfur dioxide may be present. Do not put concentrate or dilute material into food or drink container. Do not contaminate other pesticides, fertilizers, water, food or feed by storage or disposal.

In case of spill: Avoid contact, isolate area and keep out animals and unprotected persons. Confine spills.

To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter or commercial clay. If dry material, cover to prevent dispersal. Place damaged package in holding container. Identify contents.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide spray mixture 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.

CONTAINER DISPOSAL

Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other approved State and Local authorities. Do not cut or weld metal containers.

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. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, the Manufacturer or the Seller shall not 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 the directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.