

19713-408

4/27/2010

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

APR 27 2010

Luz Chan
Drexel Chemical Company
1700 Channel Avenue
P.O. Box 13327
Memphis, TN 38113

Dear Ms. Chan,

Subject: Revised Basic Confidential Statements of Formulation (CSF)
Drexel Acephate 80 Seed Protectant
EPA Reg. No. 19713-408

The CSF referred to above, submitted in connection with your application for registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. All previous CSFs will be considered obsolete.

In addition, the labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, as amended is acceptable provide you make the following change before you release the product for shipment:

On page 3, under "Use Directions," revise the sentence that reads "Observe all precautions and limitation..." to read "Follow all precautions and limitations..." to make the statement mandatory.

Please submit one final printed copy of the labeling before releasing the product for shipment. A stamped copy of the labeling is enclosed for your records. If you have any questions, please contact Autumn Metzger at (703) 305-5314 or metzger.autumn@epa.gov.

Regards,

Venus Eagle (PM 01)
Insecticide-Rodenticide Branch
Registration Division (7505P)



ACCEPTED
With COMMENTS
In EPA Letter Dated:
APR 27 2010
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
19713-408

ACEPHATE 80 SEED PROTECTANT

A systemic insecticide for treatment of Cotton seeds to help reduce injury to Cotton seedlings from thrips, cotton aphids and cutworms.

ACTIVE INGREDIENT:

Acephate (O,S-Dimethyl acetylphosphoramidothioate).....	80.0%
OTHER INGREDIENTS:	<u>20.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION
See First Aid Below

EPA Reg. No. 19713-408
EPA Est. No. 19713-XX-XXX

Net Content: 2 LBS.

FIRST AID	
If Swallowed:	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If In Eyes:	<ul style="list-style-type: none"> • 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. <p>Call a poison control center or doctor for treatment advice.</p>
Note to Physician:	Acephate is a cholinesterase inhibitor. If signs of cholinesterase inhibition appear, atropine is antidotal. 2-PAM may also be used in conjunction with atropine but should not be used alone.
Have the 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.	

DOES NOT CONTAIN DYE.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber and viton. If you want more options, follow the instructions for Category A on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators and other handlers using engineering controls must wear:

Long-sleeved shirt and long pants, shoes and socks, and chemical-resistant gloves for all mixers and loaders and for applicators using handheld application equipment.

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

Engineering Controls

Water soluble packets when used correctly qualify as a closed mixing/loading system under the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.340(d)(4)].

Mixers and loaders when using water soluble packets must:

- Wear the personal protective equipment required above for mixers/loaders, and
- Be provided, must have immediately available and must use in an emergency, such as broken package, spill, or equipment breakdown the following PPE: coveralls, chemical-resistant footwear and a NIOSH-approved dust/mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or NIOSH-approved respirator with N,R,P, of HE filter.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds.

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

Exposed treated seed may be hazardous to birds and other wildlife. Dispose of all excess treated seed and seed packaging by burial away from bodies of water.

DIRECTIONS FOR USE

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

Not for use on agricultural establishments in hopper box, slurry box, or other seed treatment applications at or immediately before planting.

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

USE INSTRUCTIONS

Do not handle the packets with wet gloves or allow the packets to become wet prior to addition to the spray tank. If only one packet is used, close and reseal outer container to protect the remaining packets.

To prepare the solution, drop the unopened packet of the product into the spray tank containing at least one-half the desired total quantity of water. Continue to add water with the agitator running until the desired volume is reached. Depending on the water temperature and degree of agitation, the packet should completely dissolve in approximately 5 minutes.

PRODUCT INFORMATION

ACEPHATE 80 SEED PROTECTANT is a water soluble systemic insecticide which helps to reduce injury to Cotton seedlings by several insects. DOES NOT CONTAIN DYE.

Thrips and Cotton Aphids:

This product gives effective reduction of these pests up to three weeks after planting.

Black (Greasy) Cutworm:

This product gives effective reduction of black (greasy cutworm damage from planting through the 3 to 4 leaf stage of development. When planting seed into fields where large cutworms are present (5th instar and larger), economic damage may occur.

USE DIRECTIONS

This product dissolves quickly in water with minimum agitation.

Observe all precautions and limitations on labeling of all products used in mixtures.

COTTONSEED: Thrips, Cotton aphids, Black (Greasy) cutworm – Use one 2 lb. water soluble packet to treat 500 pounds of seeds. Seed treatment may be made in a slurry tank or in sufficient water for thorough coverage with approved fungicides.

USE RESTRICTIONS

The processing of treated seed for oil or use for food/feed is prohibited.

When using formulations that do not contain dye, to comply with 21 CFR Chapter 1, Section 2.5, all seeds treated with a pesticide must be colored to distinguish and prevent subsequent inadvertent use as a food for man or feed for animals.

Seeds commercially treated with this product must be labeled in compliance with all the requirements of the Federal Seed Act. Seeds commercially treated with this product must be labeled as follows: "TREATED SEED. DO NOT USE FOR FOOD, FEED, OR OIL."

In addition, all bags containing treated seed must be labeled or tagged with the following information:

- This seed has been treated with Drexel Acephate 80 Seed Protectant, which contains acephate.
- Do not use treated seed for feed, food or oil processing.
- Rape greens and rapeseed grown or harvested from Drexel Acephate 80 Seed Protectant treated seed must not be used for feed or human consumption.
- Rapeseed grown and harvested from Drexel Acephate 80 Seed Protectant treated seed is only for industrial use and cannot be used for edible oil or any other human/feed consumption.
- Store away from feeds and other foodstuffs.
- Wear long-sleeved shirt, long pants and chemical-resistant gloves when handling treated seed.
- Dispose of seed packaging in accordance with local requirements.
- Exposed treated seed may be hazardous to birds and wildlife. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

STORAGE AND DISPOSAL

Do not contaminate water, foodstuffs, feed or seed by storage or disposal.

PESTICIDE STORAGE: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in cool dry place. Protect from excessive heat. Do not store or transport near feed or food. For help with any spill, leak, fire or exposure involving this material, call day or night 1-800-424-9300.

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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available, or dispose of bag in sanitary landfill, or by incineration, if allowed by state and local authorities.

WARRANTY – CONDITIONS OF SALE

Our directions 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 directed, 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 the directions given herewith. To the extent consistent with applicable law, 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 the directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

Manufactured For:
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327
(Tel. 901-774-4370)