

24061-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 1, 2009

Mr. E. David Lewis, Agent for
Takasago International Corporation (USA)
c/o Lewis & Harrison
122 C Street, NW., Suite 740
Washington, DC 20001-2109

Dear Mr. Lewis:

**Subject: Amended Labeling, Submission of Revised Basic CSF and Minor Label Changes
TECHNICAL PIPERONYL BUTOXIDE, EPA Reg. No. 24061-1
Your Submission Dated March 25, 2009**

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following label revision provision(s):

General Comment:

1. Delete all text throughout the label marked with "~~strikethrough~~."
2. Delete the listing of "[China]" as a source of supply for this product, since China was not listed on the revised basic CSF (dated March 25, 2009) for this product, which was approved by EPA on June 9, 2009.

First Aid section comment(s):

3. Relocate this section so that it appears immediately following the "**KEEP OUT OF REACH OF CHILDREN**" and "**CAUTION**" signal word on the left-hand side of the subject label.
4. Insert the following as a new 2nd row in this section (table) as follows:

If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing. call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
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5. Replace the existing 4th row in this section (table) with the following:

HOT LINE NUMBER
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-434-9600. ¹

¹ Please note that the "1-800-434-9600" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

Directions for Use section comment(s):

6. To facilitate inclusion of language from the RED for piperonyl butoxide, revise all language in this section immediately following the statement "It is a violation of Federal law ..." to read as follows:

"Only for formulation into a synergist for the following use(s): [fill blank only with those use(s) that are being supported by the MP registrant]. This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

Not for formulation into wettable powder end-use products (EUP), unless the EUP is packaged in water soluble bags.

Not for formulation into granular end-use products."

7. If you are not supporting outdoor residential misting systems use for your products, the following statement should appear on the MUP label of all liquid or wettable powder products: "Not for formulation into an end-use product for use in outdoor residential misting systems."

Storage and Disposal section comment(s):

8. Replace the existing "**PESTICIDE DISPOSAL:**" subsection with: "Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility."
9. To facilitate inclusion of language from PR Notice 2007-4, replace the existing "**CONTAINER DISPOSAL:**" subsection with: "Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities."

Precautionary Statements, Hazards to Humans section comment(s):

10. Revise the existing section header to read "**Hazards to Humans and Domestic Animals**"
11. To facilitate inclusion of language from the RED for piperonyl butoxide, revise this section to read: "Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing vapors. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse."

Environmental Hazards section comment(s):

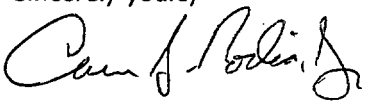

12. To facilitate inclusion of language from the RED for piperonyl butoxide, revise this section to read "This product is toxic to aquatic organisms, including fish and invertebrates. Do not contaminate water when disposing of equipment wash-waters. Do not discharge effluent containing this product into 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."

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

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If you have any questions, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosure: *Copy of label stamped "Accepted with Comments"*

024061-00001 D408500

TECHNICAL PIPERONYL BUTOXIDE

EPA REG. NO. 24061-1

EPA EST. NO. 24061-NJ-001

Active Ingredient:

*Technical Piperonyl Butoxide 100%

*Equivalent to min. 80% (butylcarbityl)(6-propylpiperonyl) ether and 20% related compounds.

CAS NO.: 51-03-6

CAS Name: 1, 3-Benzodioxole, 5-[[2-(2-butoxyethoxy)ethoxy]methyl]-6-prop

Flash Point: 414°F(212°C)

KEEP OUT OF REACH OF CHILDREN

CAUTION

DIRECTIONS FOR USE

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

ONLY FOR FORMULATION OF INSECTICIDES

Physical data and formulating information is given on the Product Description sheet. This product may be used only for the formulation of insecticides. Formulators are responsible for obtaining US EPA registration of their formulated products.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, fuller's earth, etc. Dispose of with chemical waste.

PESTICIDE DISPOSAL: Pesticide or rinse water that cannot be used according to label instructions may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

Net Contents: 50 gals.(189 Liters)

Net Weight: 440 pounds (200 kilos)

Product of ~~[[Italy]~~ ~~[China]~~ [US] Note to reviewer - Square bracketed text is optional.

Delete.

PRECAUTIONARY STATEMENTS

Hazards to Humans

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Thoroughly wash with soap and water after handling.

FIRST AID

If Swallowed	<ul style="list-style-type: none">• Immediately call a poison control center or doctor for treatment advice.• Have the 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 unconscious person.
If on Skin or Clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Immediately rinse skin with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in Eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 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. [You may also call 1-800-434-9600 for emergency medical treatment information.]	

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. 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.

WARRANTY STATEMENT

Our recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, express or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibilities, including injury or damage, resulting from its misuse as such, or in combination with other materials.

 TAKASAGO

Takasago International Corporation (U.S.A.)
4 Volvo Drive, Rockleigh, New Jersey 07647 U.S.A.
Ph. No. 201-767-9001

ACCEPTED
With COMMENTS
In EPA Letter Dated:
July 1, 2009

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No. 24061-1

HEALTH	1
FLAMMABILITY	
REACTIVITY	0
PERSONAL PROTECTION	B

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