

33658-17

11/28/2011

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



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

November 28, 2011

Frank E. Sobotka
IPM Resources LLC
4032 Crockers Lake Blvd., Suite 818
Sarasota, FL 34238

Dear Dr. Sobotka:

Subject: Amended labeling to modify the directions for use
Product Name: Chlorpyrifos Technical
EPA Reg. No.: 33658-17
EPA Decision No.: 456408
Your submission dated 10/3/11; resubmission dated 11/21/11

The proposed labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- On page 3, in the third paragraph, delete the phrase "post-bloom spray" in the statement: "Any use to formulate...products intended for use on tomatoes...is strictly prohibited." This phrase appears to have been inadvertently retained.

Please submit two copies of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Julie Chao by phone at: (703) 308-8735, or by email at: chao.julie@epa.gov.

Regards,

Venus Eagle
Venus Eagle, Product Manger (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

2095



Gharda Chemicals Limited

CHLORPYRIFOS TECHNICAL

AN INSECTICIDE FOR FORMULATING USE ONLY

Active Ingredient:

Chlorpyrifos

O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) phosphorothioate..... 98.00 %

Other Ingredients:..... 2.00 %
100.00 %

ACCEPTED
With COMMENTS
In EPA Letter Dated:
NOV 28 2011

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

33658-17

**READ ALL DIRECTIONS BEFORE USING
KEEP OUT OF REACH OF CHILDREN
WARNING**

FIRST AID (Organophosphate Insecticide)	
If swallowed:	<ul style="list-style-type: none"> ▪ Call 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 inhaled:	<ul style="list-style-type: none"> ▪ Remove 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.
If on skin or clothing:	<ul style="list-style-type: none"> ▪ 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.
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.
HOT LINE NUMBER (Organophosphate Insecticide)	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information call: 1-(866)-359-5660	
NOTE TO PHYSICIAN	
Chlorpyrifos is a cholinesterase inhibitor. Initial treatment measures include removal of secretions, maintenance of a patent airway and, if necessary, artificial respiration. When cyanosis is relieved, atropine may be administered in large therapeutic doses, repeated as necessary to the point of tolerance. If symptoms warrant further treatment, protopam chloride (pralidoxime chloride, 2-PAM chloride) has shown utility as adjunctive therapy. Never use morphine. Continued absorption of the poison may occur, resulting in a fatal relapse after initial improvement in condition. Close supervision of the patient is indicated for at least 48 to 72 hours.	

See additional precautionary statements on side panel.

Gharda Chemicals Limited
660 Newtown-Yardley Road
Newtown, PA 18940

EPA Reg. No. 33658-17
EPA Est. No. 33658-IND-3

Net Wt. 625 lbs. (283.5 KGS)

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if swallowed. May be fatal if inhaled. Do not breathe dust. Remove contaminated clothing and wash clothing before reuse. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Environmental Hazards

This pesticide is toxic to birds and wildlife, and extremely toxic to fish, aquatic organisms and bees. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with 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.

FOR MANUFACTURING USE ONLY

CHLORPYRIFOS TECHNICAL may be used only for formulation into other manufacturing-use products or end-use products for uses accepted by the United States Environmental Protection Agency. Because of their properties and intended uses, insecticidal formulations containing CHLORPYRIFOS TECHNICAL will require precautionary labeling different from that given. Formulators should develop their own use and precautionary labeling based on the properties and intended use of their own finished formulations, and are responsible for obtaining EPA registrations of these products.

CHLORPYRIFOS TECHNICAL MAY BE FORMULATED ONLY INTO END-USE PRODUCTS WITH THE FOLLOWING USES ON THE LABEL:

This product may only be formulated for the agricultural uses listed below if the EPA-approved labeling of the formulated product bears revised worker reentry intervals (REIs) of a duration no less than the following:

For all crops: 24 hours, unless specifically noted otherwise below

Cauliflower: 3 days

Fruit trees (dormant/delayed dormant: trunk spray or preplant dip): 4 days

Citrus trees: 5 days

Citrus orchard floors: 5 days

Fig: 4days

The end-use product labeling may include the following statement: "Certified crop advisors or persons entering under their direct supervision under certain circumstances may be exempt from the early reentry requirement pursuant to 40 CFR Part 170."

Agricultural Uses - Alfalfa, Asparagus, Christmas Tree Plantations, Banana, Blueberry, Caneberry, Cherimoya, Citrus Fruits, Corn (maximum of 3 lb ai/acre/season and no application to popcorn), Cotton, Cranberries, Cucumber, Date, Feijoa, Figs, Grapes, Kiwifruit, Leek, Legume Vegetables (except soybean), Mint, Onions (dry bulb), Pea, Peanuts, Pepper, Pumpkin, Sorghum, Soybeans, Sunflowers, Sugar Beets, Sugarcane, Strawberries, Sweet Potatoes, Tobacco, Tree Fruit, [apples (Only one application of any chlorpyrifos containing product can be made per year. The application can be either a pre-bloom dormant/delayed dormant to the canopy or the trunk, or a post bloom application to the lower 4 feet of the trunk)], pears, cherries, plums/prunes, peaches and nectarines), Tree Nuts (almonds, filberts, pecans, and walnuts), Vegetables (cauliflower, broccoli, Brussels sprouts, cabbage, collards, kale, kohlrabi, turnips, radishes, and rutabagas), and Wheat.

Non-Agricultural Uses - Non-Residential Outdoor Pest Control (golf courses, road medians, and industrial plant sites); and, Non-Residential Ornamentals (flowers, shrubs, vines, shade & flowering trees, non-bearing fruit, nut, and citrus trees, and evergreens), Sod Farms, Perennial Grass Seed Crops, Annual and Perennial Plants, Road Medians, and Industrial Plant Sites.

ANY USE TO FORMULATE MANUFACTURING-USE OR END-USE PRODUCTS INTENDED FOR POST-BLOOM SPRAY USE ON TOMATOES, INDOOR, GREENHOUSE, NURSERY GROWN ORNAMENTALS, PAINT ADDITIVE, PET CARE, ANIMAL HEALTH, OR FOR MOSQUITO CONTROL IS STRICTLY PROHIBITED.

ALL MANUFACTURING-USE PRODUCTS PRODUCED FROM THIS PRODUCT MUST BEAR A STATEMENT PROHIBITING FORMULATION OF SUCH PRODUCTS FOR USES OTHER THAN IDENTIFIED ABOVE.

Any manufacturing-use product formulated from this product must bear EPA-approved labeling that is consistent with the terms of the June 7, 2000 memorandum of agreement between EPA and registrants of pesticide products containing chlorpyrifos.

This product may only be used to formulate an end-use pesticide product labeled for non-agricultural, non-termite control uses in accordance with the following conditions:

Any emulsifiable concentrate (EC) end-use product formulated from this product must be labeled as a restricted use product. All end-use products formulated from this product must be labeled as restricted use or packaged in containers no smaller than 50 pounds for granular formulations. All other end-use products formulated from the product must either be labeled as restricted use or packaged in containers no smaller than 15 gallons of a liquid formulation or 25 pounds of a dry formulation.

The product may not bear use directions for any residential outdoor use.

The product may not bear use instructions for any non-residential outdoor use other than one or more of the following uses:

- (a) golf courses, road medians, and industrial plant sites, provided that the maximum label application rate is no greater than 1 lb./ai per acre;

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a cool, dry area away from heat or open flame. Protect from moisture. Avoid contamination with water, acids, or alkalis. Keep container closed. Store in original container in locked storage area.

In Case of Spill: Isolate the spill. Hold this package, other cargo and vehicles involved. For Emergency spill assistance call CHEMTREC (24-hour service): 1-800-424-9300.

Pesticide Disposal: Rinse spray equipment. Any pesticide, spray mixture, or rinse water that cannot be used according to label instructions or chemically reprocessed should be disposed of in a landfill approved for pesticides.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ 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. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

General: Consult Federal, State or local disposal authorities for approved alternative procedures.

Notice of Warranty and Disclaimer

Seller warrants that at the time of delivery the product in this container conforms to its chemical description contained hereon and is reasonably fit for its intended purpose under normal conditions of use. This is the only warranty made on this product. To the fullest extent permitted by law seller expressly disclaims any implied warranties of merchantability or fitness for any particular purpose and, except as set forth above, any other express or implied warranties. Any damages arising from breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid for this product by Buyer, and shall not include incidental or consequential damages such as, but not limited to, loss of profits or values. It is impossible to eliminate all risks inherently associated with the 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 the Seller. To the fullest extent permitted by law, in no event shall Seller be liable for the consequential, special or indirect damages resulting from the use or handling of this product. To the fullest extent permitted by law all such risks shall be assumed by the Buyer. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

Registered with comments: 12/22/03

Amended: 08/08/06 (Deleted Termiticide Use/Amended Active Ingredients Statement)

Amended: TBA (Amended per RED)