



PM 14 34704-710
P 187
File - 12/22/93

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

SEP 8 1994

J. ALLEN DUNLAP II
WILLIAM M. MAHLBURG
AGENT FOR: PLATTE CHEMICAL CO., INC.
BOX 667
GREELEY, CO. 80632

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 02/02/94 in Response to PR Notice 93-7
EPA Reg. No. 34704-710
HOLDEM INSECTICIDE-NEMATICIDE

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling as amended

AND

- WITHIN one year from date of this acceptance.

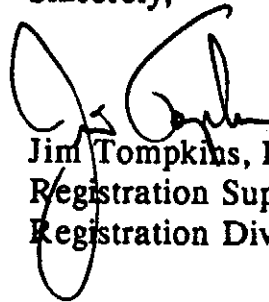
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

Willam M. Mahlburg
Platte Chemical Company

Comments for: EPA REG. NO. 34704-710
HOLDEM INSECTICIDE-NEMATICIDE

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

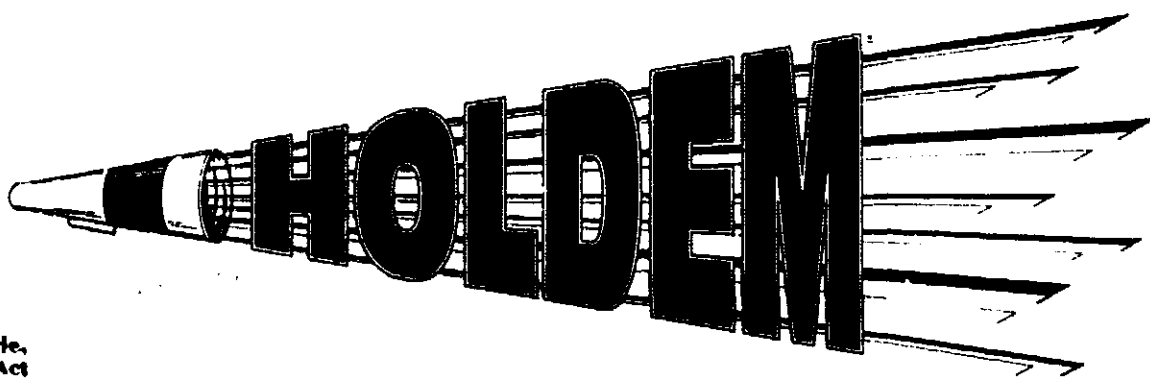
The bodywear requirement for applicators and other handlers in the Personal Protective Equipment section on your proposed labeling should be "Coveralls over long-sleeved shirt and long pants" . Remove the current "coveralls over short-sleeved shirt and short pants" and replace it with " coveralls over long-sleeved shirt and long pants".

The chemical resistant protective suit on your proposed label should be changed to "coveralls worn over long-sleeved shirt and long pants". If you decide to retain the chemical-resistant suit, you will have to include label requirements for a heat stress management program. Chemical resistant headgear for overhead exposures should be added to the PPE for mixers and loaders.

The bodywear requirement for early entry in the Agricultural Use Requirements Box on your proposed labeling should be "Coveralls over long-sleeved shirt and long pants" . Remove the current "coveralls over short-sleeved shirt and short pants" and replace it with " coveralls over long-sleeved shirt and long pants".

Delete the crossed out statements on your proposed label. They are redundant statements or phrases.

RESTRICTED USE PESTICIDE
DUE TO ACUTE ORAL, DERMAL AND INHALATION TOXICITY; EYE ABSORPTION; AND AVIAN HAZARDS.
FOR RETAIL SALE TO AND USE ONLY BY CERTIFIED APPLICATORS OR PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATOR'S CERTIFICATION.



ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 8 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
34704-710

Insecticide-Nematicide

Organophosphate Insecticide

ACTIVE INGREDIENTS:	
Ethoprop (O-Ethyl S,S-Dipropyl Phosphorodithioate)	10.0%
Phorate (O,O-diethyl S-[(ethylthio)methyl] phosphorodithioate	10.0%
INERT INGREDIENTS:	80.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
DANGER  **PELIGRO**
POISON

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

See Below For Antidote and Other Precautions.
NOT FOR USE OR STORAGE IN OR AROUND THE HOME.
EPA REG. NO. 34704-710
EPA EST. NO. 34704-NB-1

NET WEIGHT 50 LBS. (22.68 KG)

3962 WPSEX12R93

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Fatal if swallowed, inhaled, or absorbed through the skin or eyes. DO NOT get in eyes, on skin, or on clothing. Rapidly absorbed through skin. Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to poisoning. DO NOT BREATHE DUST. DO NOT CONTAMINATE FOOD OR FEED PRODUCTS. Once a bag has been opened, use it completely. Make sure that the hoppers of equipment are emptied while still in the field. Keep all unprotected persons out of operating areas.

KEEP OUT OF REACH OF DOMESTIC ANIMALS.
SYMPTOMS OF POISONING: Nausea, vomiting, abdominal cramps, diarrhea, excessive salivation, headache, dizziness, weakness, blurring or dimness of vision, excessive tearing, loss of muscular coordination, slurring of speech, twitching of muscles (especially of tongue and eyelids), mental confusion, disorientation, drowsiness, difficulty in breathing (chest tightness), runny nose.
CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Give 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Call a physician, Poison Control Center, or hospital emergency room. If not breathing, give mouth to mouth artificial respiration.
IN CASE OF SKIN CONTACT: Immediately remove all contaminated

clothing, and wash skin with soap and water. Wash clothing before reuse. Discard contaminated shoes.
FOR EYES: Flush with plenty of water for at least 15 minutes. Call a physician immediately in all cases of suspected poisoning.
IF INHALED: Remove to fresh air. If not breathing give artificial respiration, preferably mouth-to-mouth. Get medical attention immediately.

Persons providing first aid should prevent contamination of themselves.

NOTE TO PHYSICIAN: This product is a cholinesterase inhibitor. Severe symptoms and signs include diarrhea, pinpoint and non-reactive pupils, respiratory difficulty, pulmonary edema, cyanosis, loss of sphincter control, convulsions, and coma.

Support respiration as needed. Measures should include removal of secretions, maintenance of a patient airway, and if necessary, artificial ventilation.

If cyanosis is absent, give ATROPINE 2-4 mg intravenously (0.05 mg/kg for children). Repeat ATROPINE at 5-10 minute intervals until atropinization occurs (dry, flushed skin, tachycardia, pupillary dilatation), and maintain for 48 hours. If cyanotic, give initial ATROPINE intramuscularly and start measures to improve ventilation.

Start 2-PAM (PROTOPAM, Ayerst) at the same time. Give 1-2 grams PROTOPAM (20-40 mg/kg for children) in 100cc saline over 15-30 minutes. If pulmonary edema is present, give intravenously slowly as a 5% solution in water over a period of at least 5 minutes.

A second dose may be given after one hour if muscle weakness persists. Additional doses may be given cautiously for persistent muscle weakness. May be given by intramuscular or subcutaneous routes if intravenous administration is not feasible.

In case of skin contact wash patient with soap and water followed by wash with 95% ethyl alcohol. Keep patient under constant observation for 24-36 hours. Symptoms may persist for one month.

The use of theophylline, morphine, barbiturates, phenothiazines, reserpine, and succinyl choline is contraindicated.

Allow no further exposure to any cholinesterase inhibitor until cholinesterase regeneration has taken place as determined by blood tests.

Personal Protective Equipment

Applicators and other handlers (other than mixers and loaders) must wear: coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, a respirator with either an organic vapor-removing cartridge or a canister approved for pesticides (MSHA/NIOSH approval number prefix (C-230)) or a canister approved for pesticides (MSHA/NIOSH approval number prefix (C-146)).

Mixers and loaders must wear: chemical-resistant protective suit, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix (C-230)) or a canister approved for pesticides (MSHA/NIOSH approval number prefix (C-146)).

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

Engineering controls statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets with requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

BEST AVAILABLE COPY

USER SAFETY RECOMMENDATIONS

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

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to mammals, birds, fish and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Collect and incorporate granules that are spilled during loading or are visible on soil surface in turn areas. Do not contaminate water when disposing of equipment washwater or rinsate. The pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

WORK SAFETY RULES

REPEATED EXPOSURES TO CHOLINESTERASE INHIBITORS SUCH AS ARE CONTAINED IN THIS PRODUCT MAY, WITHOUT WARNING, CAUSE PROLONGED SUSCEPTIBILITY TO VERY SMALL DOSES OF ANY CHOLINESTERASE INHIBITOR.

Persons working with this product should have frequent blood tests of their cholinesterase levels. If the cholinesterase level falls below a critical point, no further exposure should be allowed until it has been determined by means of blood tests that the cholinesterase level has returned to normal. Before using this product consult the National Pesticide Telecommunications Network for recommendations regarding such blood tests, poisoning management, emergency treatment, and other information regarding the toxicity of phorate. The toll free number for the National Pesticide Telecommunication Network is 1-800-858-7378.

If handled indoors provide mechanical exhaust ventilation. Keep all unprotected persons, children, livestock, and pets away from treated areas or where there is danger of drift.

Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help right away. See First Aid (Practical Treatment) section.

DIRECTIONS FOR USE

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

IMPORTANT! Read precautionary statements before using this product. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS) at 29 CFR 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

Each 48 hour REI is interrupted by 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

PPE required for entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical resistant footwear plus socks, protective eyewear.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

This product should be applied with a granular pesticide applicator properly calibrated to assure accurate placement and proper dosage.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container. Do not store under conditions which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking, and penetration of moisture.

STORAGE: Store in safe manner. Store in original container only. Store in cool, dry place. Keep container tightly closed when not in use. Once a bag has been opened, use it completely. Reduce stacking height where local conditions, such as humidity or pallet overhang, can affect package strength. Personnel should use clothing and equipment listed under "PRECAUTIONARY STATEMENTS" when handling open containers.

SPILLED MATERIAL: Block to prevent spreading of spill. Scoop and sweep into a disposable container, whether it occurs indoors, or in the field.

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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CORN (Field, Sweet): May be used in corn grown for grain or silage.

BAND AT PLANTING APPLICATION: For the control or suppression of certain insects, apply the following rates per 1,000 linear foot of row:

- 6 to 10 ounces - control of corn rootworm.
- 6 to 8 ounces - control of wireworm, seedcorn maggot, seedcorn beetle, flea beetle and chinch bug nymphs.
- 10 ounces - for the suppression of certain nematodes (see below for species).

Apply as a 6 inch band at planting. Incorporate into the top one half to one inch of soil by making application ahead of the press wheel or behind the press wheel and dragging a short length of chain behind the press wheel. Do NOT apply in-furrow or allow granules to come in direct contact with the seed.

Nematode species suppressed: Dagger (*Xiphinema* spp), Lesion (*Pratylenchus* spp), Rootknot (*Meloidogyne* hapla, *M incognita*), Lance (*Hoplostaimus* spp), Spiral (*Helicotylenchus* spp, *Rotylenchus* spp), Sting (*Belonolaimus* spp), Ring (*Criconemella ornata*), Stunt (*Tylenchorhynchus* spp) and Stubby-root (*Paratrichodorus* spp).

BAND AT CULTIVATION APPLICATION: For the control of corn rootworm larvae apply 8 ounces per 1,000 linear feet of row. Cover the treated band with 2 to 3 inches of soil by making application immediately ahead of disc hillers or cultivation equipment. Make application in May or June when activity of rootworm larvae is first observed. Do not apply within 45 days of harvest nor feed or graze livestock within 30 days of treatment.

The minimum row spacing allowed for corn is 30 inches.

NOTE: Do not apply this product more than twice per season.

NOTICE

PLATTE WARRANTS THAT THIS PRODUCT CONFORMS TO THE CHEMICAL DESCRIPTION ON THE LABEL THEREOF AND IS REASONABLY FIT FOR PURPOSES STATED ON SUCH LABEL ONLY WHEN USED IN ACCORDANCE WITH THE DIRECTIONS UNDER NORMAL USE CONDITIONS. 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 PLATTE. IN NO CASE SHALL PLATTE BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER.

EXCEPT AS EXPRESSLY PROVIDED HEREIN, PLATTE MAKES NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND, EITHER EXPRESSED OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO, MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE.

FORMULATED FOR
PLATTE CHEMICAL CO.
150 SO. MAIN STREET FREMONT, NEBRASKA 68025-5697