

JUL 27 1990

Ralph P. Burton
Fermenta MDC Corporation
1944 Haisley Road
P.O. Box 8888
Mentor, OH 44061-8088

Dear Mr. Burton:

Subject: Amended Precautionary Statements
Technical Chlorothalonil
EPA Registration No. 30534-7
Technical Dazomet
EPA Registration No. 30534-24 ✓
Dazomet 2787 WDC
EPA Registration No. 30534-195
Your Submission Dated November 7, 1989

The amended referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable provided that you:

1. Make the labeling change listed below before you release the product for shipment bearing the amended labeling:

- In the Note to Physician, insert the word "may" between the words ". . . symptom" and "respond"
2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

54323;I/C:Stone;LR-9;KEMCO;07/13/90;08/11/90;ek;jh:ek

Precautionary Review Section, Registration Support Branch has reviewed the subject submissions and has the following recommendations:

1. The subject product's formulas are similar enough to utilize a single set of supporting acute toxicity data.
2. Precautionary labeling change requests:
 - a. Request to delete "May be a potential skin sensitizer", under Precautionary Statements is justified. Dermal sensitization study conducted using Technic-1 Chlorothalonil (NRID No. 144112, Lab No. 7020, April 15, 1982) indicated a nonsensitizer.
 - b. You are justified in removing all statements from the labels referring to "chlorothalonil . . . or this product may produce temporary allergic side effects . . .", or "Note to Physicians: Persons having an allergic reaction respond to treatment with antihistamines"
 - c. Your request to add "Note to Physician: Persons having temporary irritation symptoms may respond to treatment with antihistamines or steroid creams and/or systemic steroids" is acceptable provided "may" is inserted into the phraseology.

The "Note to User: This product may produce mild bronchial irritation and temporary irritation of the skin characterized by redness or rash on exposed skin areas. Affected persons should call a physician," is also acceptable.

3. The toxicity profile for the above subject products consists of:

Acute Oral Study - Bravo 90 DG (50534-157 - 90% A.I.)
Accession No. 253856, May 16, 1983
Toxicity Category IV Core Guidelines

Acute Dermal Study, using 90.0% Bravo 90 DG
Accession No. 253856, May 16, 1983
Toxicity Category IV Core Guidelines

Acute Inhalation Study, using Technical Chlorothalonil
MSD No. 00094942

This study listed as acceptable in Chlorothalonil Registration Standard (no additional inhalation data needed). Toxicity Category or Core Grade not given in Registration Standard.

Eye Irritation Study, using Bravo 90 DG (90.00 A.I.)
January 15, 1980
Toxicity Category I **Core Minimum**

Dermal Irritation Study, using Bravo 90 DG (90.0% A.I.),
Accession No. 253856, May 16, 1983
Toxicity Category IV

Core Guidelines

Dermal Sensitization Study, using Technical Chlorothalonil)
(97.8% A.I.)
NRID No. 144112, April 15, 1982
Not a contact sensitizer

Core Guidelines

4. Labeling

- a. The DANGER signal word is appropriate.
- b. The Precautionary Statements are acceptable.
- c. The Statement of Practical Treatment is acceptable.
- d. Deletion of the "May be a potential skin sensitizer" from the Technical Deconil 2787 (EPA Registration No. 50534-24) and Technical Chlorothalonil (EPA Registration No. 50534-7) labels is acceptable.
- e. Deletion of statements regarding temporary allergic side effects, and Note to Physician is acceptable. The deletion of "Note to User" under Directions for Use is acceptable.
- f. The addition of a Note to Physician, as indicated on sample labels, is acceptable provided the word "may" is inserted between the words . . . symptom and respond
- g. The addition of a "Note to User:", as shown on the Sample labels is acceptable.

Sincerely yours,

Susan Lewis
Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

Net Contents:

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 1990

Under Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.
50534-24



Technical Daconil 2787[®] Fung

For Formulation Purposes Only

Active Ingredient: Chlorothalonil (tetrachloroisophthalonitrile)*	96.0%
Inert Ingredients:	4.0%
Total:	100.0%

Keep Out of Reach of Children

DANGER: See side panel for additional
precautionary statements

Precautionary Statements Hazards to Humans and Domestic Animals

Danger

Corrosive, causes severe eye damage.

May be a potential skin sensitizer. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield, rubber gloves, long sleeve shirt, and long pants when mixing, loading and applying this product. May be fatal if inhaled. Do not breathe dust. Harmful if swallowed or absorbed through the skin.

First aid: In case of eye contact, flush eyes with water for 15 minutes, get medical attention immediately. In case of skin contact, wash exposed areas of skin with soap and warm water. This product may produce temporary allergic side effects characterized by redness of the eyes, mild bronchial irritation and redness or rash on exposed skin areas. Person having allergic reaction should contact a physician. Note to physician: Persons having an allergic reaction respond to treatment with antihistamines or steroid creams and/or systemic steroids. In case of inhalation, remove person to fresh air and get medical attention immediately.

Environmental Hazards

Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

Note to Physician: Persons having temporary irritation symptoms respond to treatment with antihistamines or steroid creams and/or systemic steroids.

Note to User: This product may produce mild bronchial irritation and temporary irritation of the skin characterized by redness or rash on exposed skin areas. Affected persons should consult a physician.

Directions for Use

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

~~Note to User: Technical Deco 2767 Fungicide may produce temporary allergic side effects characterized by redness of the eyes, mild bronchial irritation and redness or rash on exposed skin areas. Persons having allergic reaction should contact a physician.~~

For Formulation Purposes Only

This product is intended for use only by formulators in preparing fungicides.

Information on the composition, methods of use, applicable restrictions or limitations, and effectiveness of the product for pesticide purposes may be obtained from Fermenta ASC Corporation. Labeling of pesticide formulations made from this product must conform to Federal label requirements for end-use chlorothalonil products.

Storage and Disposal

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

Storage: Store in a cool place. Protect from excessive heat.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, pesticide formulation or residue 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). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Warranty and Limitation of Damages

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty, including any other express or implied warranty of Fitness or of Merchantability, and no agent of Seller is authorized to do so except in writing and with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which claim is made.