

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 12 2003

Morris Gaskins  
Micro Flo Company LLC  
P. O. Box 772099  
Memphis, TN 38018

Dear Mr. Gaskins:

Amended Registration  
Tribufos Technical  
EPA Reg. No. 51036-324  
Submission dated October 4, 2002

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following changes:

1. Under "First Aid";
  - a. Place the "If on Skin or Clothing" paragraph above the "if in Eyes" paragraph.
  - b. Add the following statements to the end of this section:  
"Have the product container or label with you when calling a poison control center or doctor, or going for treatment."  
"Note to Physician: This product contains organophosphate, it produces cholinesterase inhibiting physiological effects."
2. Under "Precautionary Statements";
  - a. Move the Emergency Telephone Numbers to the end of the "First Aid" box.
  - b. Replace "May be fatal . . . , or on clothing" with the following:  
"May be fatal if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear protective clothing or gloves."
3. Under "Environmental Hazards";

Add "terrestrial plants" before "aquatic plants" in the first sentence.

Page 2

EPA Reg. No. 51036-324

4. It is recommended that you add a "Personal Protective Equipment" section with the following statements:

The formulators and handlers must wear:

- Coveralls.
- Chemical resistant gloves made of waterproof materials, such as butyl rubber 14 mils, natural rubber  $\geq 14$  mils, neoprene rubber  $\geq 14$  mils, or nitrile rubber  $\geq 14$  mils.
- Shoes and socks.

5. Under "Storage and Disposal";

The three paragraphs should be rearranged in the following order:

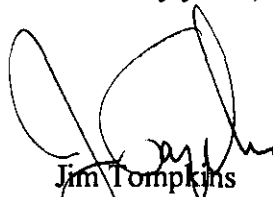
- Pesticide Storage.
- Pesticide Disposal.
- Container Disposal.

6. Under "Liability Claims";

The Agency has not reviewed or accepted the warranty statement. It may need to be changed at a later date.

The amended label supersedes all previously accepted labels. A stamped copy of the revised label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment.

Sincerely yours,



Jim Tompkins  
Product manager (25)  
Herbicide Branch  
Registration Division (7505C)

Enclosure

3/6

JUN 12 2003

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

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

51036-324

# TRIBUFOS TECHNICAL

Defoliant

FOR USE IN THE MANUFACTURE OF DEFOLIANTS

**ACTIVE INGREDIENT:**

S,S,S-Tributyl phosphorotrithioate..... 97.0%

INERT INGREDIENTS:..... 3.0%

TOTAL:.....100.0%

STOP - Read the Label Before Use.

KEEP OUT OF REACH OF CHILDREN

### WARNING

#### FIRST AID

**IF SWALLOWED:**

- 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:**

- 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.

**IF ON SKIN OR CLOTHING:**

- 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 INHALED:**

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

EPA Reg. No. 51036-324

EPA Est. No. \_\_\_\_\_

NET CONTENTS: \_\_\_\_\_

Manufactured By:  
MICRO FLO COMPANY LLC  
P.O. BOX 772099  
MEMPHIS, TN 38117

4/6

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed, inhaled or absorbed through skin. Do not breathe spray mist. Do not get in eyes, on skin, or on clothing. Do not contaminate feed or food. Wash with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

EMERGENCY TELEPHONE NUMBERS: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact:

- (800) 424-9300 CHEMTREC (transportation and spills)
- (800) 900-4044 Poison Control Center (human health)
- (800) 345-4735 ASPCA (animal health)

### ENVIRONMENTAL HAZARDS

This product is toxic to aquatic plants, fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or 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.

### DIRECTIONS FOR USE

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

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency.

For specific information on federally registered uses, contact Micro Flo Co. Any variance from the federally registered labeling for products containing DEF will have to be supported by data provided by the formulator.

Only for formulation into a defoliant, for (1) the following uses:  
Terrestrial Food Crop: cotton

5/6

(2) This product may be used to formulate products for additional uses not listed on this label if the formulator, user group, or grower has complied with the U.S.EPA submission requirements regarding support of such use(s)

#### RESTRICTIONS

Thoroughly clean the spray equipment with a chemical cleaner before using for other products.

Do not store near fertilizers, seeds, insecticides, or fungicides.

#### STORAGE AND DISPOSAL

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

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. 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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PESTICIDE STORAGE:** Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, seed, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If the container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides above. In spill or leak incidents, keep unauthorized people away.

You may contact Micro Flo Company for decontamination procedures or any other assistance that may be necessary. Micro Flo Company's telephone number is 800-451-8461 or contact Chemtrec at 800-424-9300.

6/6

MICRO FLO COMPANY DISCLAIMS ALL LIABILITY BASED ON BREACH OF WARRANTY, NEGLIGENCE, STRICT TORT LIABILITY, OR ANY OTHER THEORY OF LIABILITY FOR CROP DAMAGE OR FAILED EFFICACY RESULTING FROM THE USE OF THIS MILES INC. PRODUCT AS AN INGREDIENT IN ANY FORMULATION WITH A USE NOT SPECIFICALLY LISTED ON THIS LABEL.