

55050-3

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

DEC 21 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Laura Anderson
Arkema, Inc
900 First Avenue
King of Prussia, PA 19406

Subject: Paladin Technical
EPA Reg. No. 55050-3
Phase 2 RED Mitigation Amendment – Label Submitted 5-26-2011
EPA Decision Number 451189

Dear Ms. Anderson:

The amended label referred to above, submitted to satisfy requirement #3 in the Registration Notice dated July 9, 2010 for Paladin Technical, under the Federal Insecticide, Fungicide and Rodenticide Act as amended, is acceptable with the following condition.

CONDITION

EPA has determined that the risk mitigation measures on the revised label for this product are necessary to adequately protect human health and the environment. Therefore, pursuant to 40 CFR § 152.130(d), EPA has decided that no product bearing previously approved labeling may be sold or distributed (released for shipment) by its registrant after December 1, 2012. Wherever state approval is required for sale or distribution of this product with this new labeling, EPA strongly encourages you to submit an application to the state authority as soon as possible. You should be aware that the Agency does not intend to modify the December 1, 2012 deadline because of any failure to obtain state approvals.

One copy of the label stamped "Accepted with comments" is enclosed for your records. If you have any questions, please contact Andrea Mojica by phone at 703-308-0122 or via email at mojica.andrea@epa.gov or Tony Kish by phone at 703-308-9443, or email at kish.tony@epa.gov.

Sincerely,

Tony Kish
Product Manager Team 22,
Fungicide Branch, Registration Division
Enclosure

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 2 1 2011

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

PALADIN[®] Technical

ACTIVE INGREDIENT:

Dimethyl disulfide 99.8%

55050-3

OTHER INGREDIENTS: 0.2%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN WARNING / AVISO

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

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 by a poison control center or doctor.
- Do not give anything by mouth to an unconscious or convulsing person.

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.

IF ON SKIN:

- 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:

- 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 contact Rocky Mountain Poison Control Center at (303) 623-5716 for emergency medical treatment information.

EPA Registration No. 55050-3

EPA Establishment No. 055050-FRA-003

NET CONTENTS: _____

Arkema Inc.
900 First Avenue
King of Prussia, PA 19406

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)
WARNING**

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Do not breathe vapor. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, shoes plus socks, and chemical-resistant gloves (such as nitrile or butyl). 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.

PHYSICAL HAZARDS

This product contains flammable liquid and vapor. Keep away from heat and open flame.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

PALADIN Technical may only be used for repacking or formulation into end-use products intended for preplant fumigation of soil to control soil borne pests for the cultivation of the following fruiting vegetables: tomatoes, peppers, and eggplant; the following cucurbit crops: cucumbers, squash (all varieties), and melons (all varieties); the following small fruit crops: strawberries and blueberries; field grown ornamentals; and forest nursery crops. This product may also be used to formulate products for any additional use(s) not listed on this manufacturing use label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s). Manufacturer disclaims liability for claims or damages resulting from any use of a formulated product in a manner not listed on this label.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to mammals, birds, fish, and aquatic invertebrates. 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. Do not contaminate water when disposing of equipment washwaters.

“Dimethyl Disulfide (DMDS) cannot be formulated into end-use products labeled for preplant or pre-transplant uses unless the end-use registrant makes available to certified applicators who purchase or apply the end-use product a registrant developed training program approved by EPA. The training program must provide information on (1) how to correctly apply the fumigant, including how to comply with new label requirements; (2) how to protect handlers and bystanders; (3) how to determine buffer zone distances; (4) how to complete an FMP and the post-application summary; (5) how to determine when weather and other site-specific factors are not favorable for fumigant application; (6) how to comply with required GAPs and how to document compliance with GAPs in the FMP; and (7) how to develop and implement emergency

response plans. The registrant developed training program must be made available at least annually to the certified applicators. The end-use registrant must be able to provide, upon request, the names, addresses, and certified applicator license and/or certificate number of persons who successfully complete the registrant developed training program.

DMDS cannot be formulated into end-use products labeled for pre-plant or pre-transplant uses unless the end-use registrant ensures Buffer Zone signs suitable for posting buffer zones or templates for the buffer zones signs are available to its downstream distributors/customers who in turn will provide the signs at the point of sale. Templates may be downloaded from

http://www.epa.gov/pesticides/reregistration/soil_fumigants/index.htm

The Buffer Zone sign must meet the following standards:

- Signs must remain legible during the entire posting period, and must meet the general standards outlined in the WPS for sign size, text size, and legibility (see 40 CFR §170.120).

Contents of Sign



- "DO NOT ENTER/NO ENTRE,"
- "Dimethyl Disulfide [Name of Product] Fumigant BUFFER ZONE,"
- space for contact information for the certified applicator in charge of the fumigation"

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a well-ventilated area away from heat and sources of ignition such as flames, sparks, and static electricity. Do not store near or with oxidizers. Store only in areas that are authorized for flammable material storage. Cylinder storage must be in an area as designated by local and State requirements. Make certain cylinder tops are closed and cylinder remains in an upright position. Store only in original containers.

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 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 or your local Arkema Inc. representative.

Container Disposal: When cylinder is empty, close valve, screw safety cap onto valve outlet, and replace protection bonnet before returning to shipper. Only Arkema Inc. is authorized to refill cylinders. Do not use cylinders for any other purpose. Follow supplier's instructions for return of empty or partially empty cylinders.

CONDITIONS OF SALE AND LIMITATIONS OF WARRANTY AND LIABILITY

The Directions for Use of this product must be followed carefully. 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 manner of use or application, weather or crop conditions, presence of other materials, resistant strains or other influencing factors in the use of the product. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Arkema Inc., Manufacturer and Seller harmless for any claims relating to such factors. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARKEMA INC. AND MANUFACTURER MAKE NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ON THIS LABEL.

To the extent consistent with applicable law, Arkema Inc., Manufacturer or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ARKEMA INC., MANUFACTURER AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARKEMA INC., MANUFACTURER OR SELLER, THE REPLACEMENT OF THE PRODUCT.

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Revision 05/31/2011