

PM 23

59639-70

9-23-99

SEP 23 1999

Ms. Cheryl D. Miller
 Valent USA Corporation
 1333 North California Blvd. Suite 600
 Walnut Creek, CA 94596

Dear Ms. Miller:

SUBJECT: Label Amendment Adding Terrestrial Non-Food Uses
 Lactofen Manufacturing Concentrate
 EPA Registration No. 59639-70
 Your Submission, Dated September 13, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

On August 29, 1995, the Agency approved labeling for the subject product but required Valent to add a Net Contents statement and Container Disposal instructions in the final printed labeling. There is no indication in our records that final printed labeling incorporating these changes was ever submitted. In our telephone conversations on September 22, 1999, concerning this matter, you indicated that these statements were not appropriate in this case, since the product is sold and distributed only in bulk (tank car) containers. We agree with you that Net Contents and Container Disposal statements are not needed in this case and hereby rescind our earlier requirement to add them to the label. We also understand that, although the product is generally stored in the original tank car prior to use, it may occasionally be moved to and stored in a bulk storage tank at the manufacturing facility. Since the product may be moved from its original container, at your next label printing you must delete the following statement from the Storage instructions on the last page of the label:

- "Keep pesticide in original container."

The Agency has recently revised its recommended First Aid statements for pesticide products and intends to issue a PR Notice announcing the changes in the near future. In the interim we are encouraging registrants to begin using the new statements. The new statements were developed as part of the Consumer Labeling Initiative in close cooperation with poison control center personnel and other medical experts. While it is not mandatory that you revise

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CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Sep 23, 1999							

your label at this time, you are strongly encouraged to substitute the revised statements (below) for those statements currently on the label at your next label printing

"FIRST AID

If swallowed:	<ul style="list-style-type: none"> • 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.
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. • Call a poison control center or doctor for treatment advice.
If on skin:	<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 inhaled:	<ul style="list-style-type: none"> • 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.

Have the product container or label with you when calling a poison control center or doctor or going for treatment."

Sincerely yours,



Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosure

3045



LACTOFEN Manufacturing Concentrate

Active Ingredient	By Wt.
*Lactofen	60%
Other Ingredients	40%
* 1-(carboethoxy)ethyl 5-[2-chloro-4-(trifluoromethyl)phenoxy]-2-nitrobenzoate	

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

SEP 23 1999

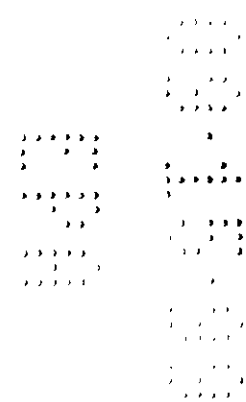
**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
59639-70**

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

TRANSPORTED IN BULK



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed, inhaled, or absorbed through the skin. Do not get in eyes or on skin or clothing. Wear goggles or face shield, coveralls or tightly woven long sleeved shirt, and rubber gloves when handling. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

This product contains lactofen which has been determined to cause tumors in laboratory animals (rat, mouse). Risks can be reduced by closely following precautions and wearing the protective clothing specified elsewhere on this label.

STATEMENT OF PRACTICAL TREATMENT:

- If in eyes:** Flush with plenty of water for at least 15 minutes. Get medical attention immediately.
- If swallowed:** DO NOT INDUCE VOMITING. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Get medical attention immediately.
- If on skin:** Wash with plenty of soap and water.
- Note to Physicians:** Emergency Information-call 1-800-892-0099.

ENVIRONMENTAL HAZARDS:

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.

PHYSICAL OR CHEMICAL HAZARDS:

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

AN HERBICIDE FOR FORMULATION USE ONLY

THIS PRODUCT IS FOR USE IN THE FURTHER PREPARATION OF HERBICIDE PRODUCTS. CONTACT VALENT U.S.A. CORPORATION FOR SPECIFIC FORMULATING INFORMATION. DO NOT USE FOR ANY OTHER PURPOSE.

Lactofen Manufacturing Concentrate must be blended with appropriate EPA approved solvents, emulsifiers and surfactants in the formulation of EPA registered end use herbicides.

Only for Formulation Into Herbicide Products Intended For:

- (1) The Following Use(s):
 - Liquid Formulations -
 - Terrestrial Food Uses On: Cotton, Soybeans
 - Terrestrial Non-Food Uses On: Conifer Seedlings, Kenaf
- (2) Uses For Which USEPA Has Accepted The Required Data And/Or Citations of Data That The Formulator Has Submitted
- In Support of Registration; and (3) Uses for Experimental Purposes That Are In Compliance with USEPA Requirements.

