

62719-349

12/17/2002

1/4



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

DEC 17 2002

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

A. Sterett Robertson
Regulatory Manager
Regulatory Success-America
Dow AgroSciences LLC
9330 Zionsville, IN 46268-1054

Subject: Label Amendment: First Aid per PR Notice 2001-1, Storage and Disposal
EPA Reg. No. 62719-349
Lentrek 6
Submission dated September 17, 2002, **Acceptable with Comments.**

Dear Mr. Robertson:

The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comment:

Add to the "Note to Physician" "Contains petroleum distillate-vomiting may cause aspiration pneumonia".

A stamped copy "accepted with comments" of the label is enclosed for your records.

Please submit two (2) copies of the final printed label for our records before releasing the product to market.

If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Akiva Abramovitch".

Akiva Abramovitch, Ph.D.

Chemist

Insecticide/Rodenticide Branch

Registration Division (7505C)

(Logo) Dow AgroSciences

Lentrek* 6

Insecticidal Concentrate

For Manufacturing Use Only to Formulate Wood Preservative Products.

Active Ingredient:

chlorpyrifos: O,O-diethyl O-(3,5,6-trichloro-2-pyridinyl) phosphorothioate.	62.5%
Inert Ingredients	37.5%
Total	100.0%

ACCEPTED
with COMMENTS
In EPA Letter Dated:
DEC 17 2002

Contains 6 pounds of chlorpyrifos per gallon.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 62719-349.

WARNING

Precautionary Statements

Hazard to Humans and Domestic Animals

May Be Fatal If Swallowed • Harmful If Inhaled

Avoid breathing vapor. Handle concentrate in a ventilated area. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse. Keep away from food, feedstuffs and water supplies.

First Aid

If swallowed: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give **any** liquid to the person. Do not give anything by mouth to an unconscious 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.

Note to physician: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate significance of exposure (baseline data are useful). Atropine, only by injection, is the preferable antidote. Oximes, such as 2-PAM/protopam, may be therapeutic if used early; however, use only in conjunction with atropine. In case of severe acute poisoning, use antidote immediately after establishing an open airway and respiration.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This pesticide is toxic to birds and wildlife, and extremely toxic to fish and aquatic organisms. 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

Combustible. 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. The June 7, 2000 memorandum of agreement between the EPA and registrants of pesticide products containing chlorpyrifos only applies to registered uses of chlorpyrifos in the U.S.

For Manufacturing Use Only.**Manufacturing-Use Product Labeling Requirements**

After October 1, 2000, any manufacturing-use product formulated from this product must bear EPA-approved labeling that is consistent with the terms of the June 7, 2000, memorandum of agreement between EPA and registrants of pesticide products containing chlorpyrifos.

This product may be used ONLY for formulation into an insecticide for the following uses:

Lentrek* 6 insecticidal concentrate may be used only for formulation into wood preservative products for non-residential outdoor uses accepted by the United States Environmental Protection Agency.

Use of this product for formulation of Non-Agricultural End-Use products for other than Termite Control must meet the following requirements:

After December 1, 2000, this product may only be used to formulate an end-use pesticide product labeled for non-agricultural, non-termite control uses in accordance with the following conditions:

- Any emulsifiable concentrate (EC) end-use product formulated from this product must be labeled as a restricted use product. All other end-use products formulated from the product (other than containerized baits in child-resistant packaging) must either be labeled as restricted use or packaged in containers no smaller than 15 gallons of a liquid formulation or 25 pounds of a dry formulation.
- The end-use product may not bear use instructions for any non-residential outdoor use other than the following use:
 - fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, wooden containers, poles, posts and processed wood products.

Important Note:

Because of their properties and intended uses, wood preservative products containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended use of their own finished formulations, and are responsible for obtaining EPA registration of these wood preservative products.

Storage and Disposal

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

Pesticide Storage: Store in original container in secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Do not store above 100°F for extended periods of time. Storage below 23°F may result in formation of crystals. If product crystallizes, store at 72° to 90°F and agitate to redissolve crystals. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

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.

Metal 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.

Plastic 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.

Reusable Portable Containers: Do not rinse or put any other material into container. When returning reusable portable container, seal all openings and return to collection point designated by Dow AgroSciences.

Warranty Limitations and Disclaimer

Dow AgroSciences warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Dow AgroSciences EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-349

EPA Est. _____

*Trademark of Dow AgroSciences LLC
Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

Insecticide

Net Weight _____

EPA-Accepted: ___/___/___