

64864-33

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

NOV 13 2002

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Andrew Kieniksmann
Regulatory Specialist
Pace International, LLC
1011 Western Avenue
Seattle, WA 98104

Subject: Label Amendment: First Aid and Directions for Use clarifications.
Leffingwell Supreme 415 Oil
EPA Reg. No. 64864-33.
Submission dated August 1, 2002.

Dear Mr. Kieniksmann:

The labeling referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments specified in my letter and listed below: A stamped copy of the label "accepted with comments" is enclosed for your records.

Your statement under IF SWALLOWED is incomplete.

The recommended wording for First Aid for If swallowed are presented in the following table:

FIRST AID

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

If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give any liquid to a person • Do not give anything to an unconscious person.
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.

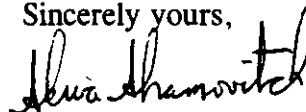
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
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The "Note to Physician" should state "Contains petroleum distillate-Vomiting may cause aspiration pneumonia"

Environmental Hazards statement remove For terrsetrial uses and begin with "Do not apply directly to water....."

Please submit two (2) copies of the final printed label for our files prior to releasing the product for shipment. If you have any questions please call me at (703) 308-8328.

Sincerely yours,



Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch
Registration Division (7505C)

Leffingwell Supreme 415 Oil

Active Ingredient:

Mineral Oil..... 99.69%

Inert Ingredients: 0.31%

Total..... 100.00%

EPA REG NO. 64864-33

EPA EST. NO.

Keep Out of Reach of Children
CAUTION - CUIDADO

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

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If swallowed	<ul style="list-style-type: none"> Call poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
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 eye. Call poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 minutes. Call 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 poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN Contains petroleum distillates. May cause aspiration pneumonia.	

Accents: _____ Gallons (Bulk)
with COMMENTS
In EPA Letter Dated:
NOV 13 2002

Manufactured By:
 Pace International, LLC
 1011 Western Avenue, Suite 505
 Seattle, WA 98104
 800-936-6750

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

64864-33

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

Caution: Harmful if swallowed or absorbed through skin or inhaled. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category E on an EPA chemical resistance category selection chart.

Applicators and Other Handlers Must Wear: A long-sleeved shirt & long pants; chemical resistant gloves such as barrier laminate, or neoprene rubber, or nitrile rubber, or viton; shoes plus socks, protective eyewear.

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should: 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.

ENVIRONMENTAL HAZARDS

For terrestrial uses, DO NOT apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Avoid spray drift onto bodies of water. DO NOT contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

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

DO NOT apply this product through any type of irrigation system.

DO NOT apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls, chemical resistant gloves such as a barrier laminate or nitrile rubber, or neoprene rubber, or viton, shoes plus socks, protective eyewear.

GENERAL DIRECTIONS

This product is to be diluted with water before application. Dilute spray volumes and concentrate dose rates are indicated below. Dilute spray recommendations are to be interpreted as gallons of Leffingwell Supreme 415 Oil per 100 gallons of water.

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DILUTE SPRAY RECOMMENDATIONS

Crop	Gallons of Dilute Spray For Recommended Dosage	Gallons of Oil per Acre By Concentrate Sprayer*
Citrus & Avocados	400 to 3000	18 to 20
Stone Fruit & Almonds	250 to 800	4 to 6
Apples & Pears	250 to 800	4 to 6
Olives	400 to 3000	—
Walnuts	400 to 3000	4 to 6
Grapes	50 to 300	½ to 2

*Application in 50 - 100 gallons of spray per acre is preferred but not required depending on spray equipment.

DO NOT use when the soil (especially the sub-soil) is relatively dry.

DO NOT use when freezing temperatures are expected.

DO NOT use when the temperature is above 95 degrees Fahrenheit.

DO NOT use with Captan, Omite, Sulfur, Lime Sulfur or Methoxychlor.

DO NOT use oil 60 days before or until 90 days after Sulfur or Captan products.

TANK MIXES: Leffingwell Supreme 415 Oil may be tank mixed with other pesticides. When tank mixing with other pesticides, check compatibility before mixing in application equipment. Follow all precautions and instructions on pesticide labels being tank mixed.

Leffingwell Supreme 415 Oil is compatible with Nutra-Spray® foliar nutrient powders which may be used at the rate of 1 1/2 to 3 lbs. per gallon of spray mixture.

LEMONS, ORANGES, GRAPEFRUIT, OTHER CITRUS VARIETIES - Red Scale, Yellow Scale, Purple Scale, Black Scale, Brown Soft Scale, Citricola Scale, Citrus Red Mite, Citrus Bud Mite, Pacific Mite, Two-Spotted Mite: 1.2 to 1.4 gals. per 100 gals. of water with thorough coverage in Southern California, April through May and/or September through December. In Central California, July through September. Higher dosage is recommended for heavier infestations in early fall. To aid the control of Red, Black, Yellow or Purple Scale add a suitably labeled insecticide. See below for Low Volume and additional Black Scale uses.

ORANGES AND LEMONS (LOW VOLUME APPLICATION) - Citrus Red Mite: Apply at the rate of 15 to 20 gals./acre by helicopter, low volume modified speed sprayer, or other low volume sprayer. Observe all cautions for proper practice noted on this label.

Leffingwell Supreme 415 Oil may also be used as a spreader-sticker with insecticides or miticides at a rate not to exceed 1.0%.

ALL CITRUS VARIETIES; Black Scale - Apply at the rates recommended above as soon as practicable following completion of major hatch. When treatment has been delayed and larger stages are present, add a rotenone-containing product or other suitably labeled insecticide according to its label directions. When an additive is used, the oil dosage may be reduced to 3 qt./100 gal. water. As an emergency treatment, the 3 qt. combination rate may be used later in fall months than an oil spray at full dosage.

YOUNG NON-BEARING CITRUS; Mites - 1.2 gal. per 100 gallons of water during spring, late summer, and fall months with thorough coverage.

APRICOTS, ALMONDS, CHERRIES, PEACHES, PLUMS, PRUNES and OTHER STONE FRUIT - Summer use: Red Mites - 1 gallon Leffingwell Supreme 415 Oil in 100 gallons of water or 6 gallons per acre in 100 to 300 gallons of water with the following special recommendations in addition to the general cautions: 1)DO NOT apply over certain fresh market fruits after bloom starts to form as the oil spray will remove waxy bloom. 2)Application should not be made over oil sensitive varieties of plums, apricots and almonds. **NOTE:** On prune trees sensitive to oil, application should be made in the period between February 15 and the popcorn stage. Summer stage (post harvest): Brown Apricot Scale, San Jose Scale - 1 to 1.5 gals. per 100 gallons of water. Dormant or Delayed Dormant: San Jose Scale, Parlatoria Scale, Brown Apricot Scale, Black Scale, Mite Eggs, Aphid Eggs - 2 gals. per 100 gallons of spray mixture. Delayed Dormant: Leaf Roller Eggs - 2.5 gals. per 100 gallons of spray.

APPLES AND PEARS - Summer application: Red Mites - 1 gal. per 100 gal. of water. DO NOT apply over fruit after waxy bloom forms as oil will remove the wax. Immature summer stage (post harvest): San Jose and Italian Pear Scale - use 1 to 1.5 gals per 100 gals. of water. General use as an aid in adherence of insoluble insecticides: use one quart to 100 gallons of spray. Dormant and Delayed Dormant: San Jose Scale, Italian Pear Scale - 1.5 to 2 gals. per 100 gallons of spray mixture. Delayed Dormant: Leaf Roller Eggs - 2.5 gals per 100 gal. of spray mixture. Pear Psylla - 1 gal. per 100 gal. of spray mixture.

AVOCADOS - HAAS VARIETY ONLY - Avocado Brown Mite, 1 gal. per 100 gallons of water with thorough coverage through late fall.

GRAPES DORMANT - Mealy Bug - 1 gal. per 100 gallons of water.

OLIVES - Pariatoria Scale, Oleander Scale: Post bloom to June 30, use 1 1/2 gal. Leffingwell Supreme 415 Oil per 100 gallons of water, or 1 gal. this product plus a carbaryl-containing insecticide according to its label directions. July 15 to 60 days before harvest, use 1 1/2 gal. of product per 100 gallons of water.

Black Scale: After initial hatch in August 10 to 20, use 1 to 1 1/2 gal. Leffingwell Supreme 415 Oil per 100 gallons of water.

WALNUTS - NOTE: Oil may cause damage on walnut trees that have been dry or poorly fertilized.

San Jose Scale: Emergency treatment only. Consult local agricultural extension service before using. Use 0.8 gal. Leffingwell Supreme 415 Oil per 100 gal. of water with a diazinon-containing insecticide according to its label directions. Apply post-bloom through June 1. DO NOT exceed 4 gal. this product per acre.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

STORAGE: Store in a dry location.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 incineration, or if allowed by burning. If burned, stay out of smoke.

IMPORTANT: Read the information below before using this product. If the terms are not acceptable, you should return the unopened product container immediately for a complete refund.

LIMITED WARRANTY, TERMS OF SALE, AND LIMITATION OF LIABILITY

Upon purchase or use of this product, purchaser and user agree to the following terms:

Warranty: Pace International, LLC (the Company) warrants that this product conforms to the chemical description on the label in all material respects and is reasonably fit for the purpose referred to in the directions for use, subject to the exceptions noted below, which are beyond the Company's control. The Company makes no other representation or warranty, express or implied, concerning the product, including no implied warranty of merchantability or fitness for a particular purpose; no such warranty shall be implied by law, and no agent or representative is authorized to make any such warranty on the Company's behalf.

Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user. Sale of this product is governed by the internal laws of the state of Washington; any action with respect to this product shall be brought exclusively in the state or federal courts located at Seattle, Washington U.S.A.

Limitation of Liability: The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damages, and in no event shall damages or any other recovery of any kind exceed the price of the product which caused the alleged loss, damage, injury or other claim. Under no circumstances shall the Company be liable for any special, indirect, incidental or consequential damages of any kind, including loss of profits or income, and any such claims are hereby waived.

The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

Leffingwell is a Registered Trademark of Pace International LLC

Supreme 415 Oil is a Trademark of Pace International LLC

041502 Draft First Aid

Lot #

MADE IN USA