



70166-4 6/9/98
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 9 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Don Dean
President
Sundance Ag., Inc.
P.O. Box 9
Burley, ID 83318

Subject: Review of Label Amendment to Add Sewer Use, Acute Toxicity and Product Chemistry Data
Metam-Fluid Manufacturers Concentrate
EPA Reg. No. 70166-4 (Formerly EPA Reg. No. 52251-41)
Your Submissions Dated 09/19/97, 10/9/97 and 11/03/97

Dear Mr. Dean:

Please disregard our letter dated August 1, 1997. The appropriate signal word for all metam-sodium products is **DANGER/PELIGRO**. Thank you for bringing this to our attention. The Agency has completed the reviews for the label amendment to add the sewers use and the product chemistry and acute toxicology data reviews. The results are as follows:

1. The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the following conditions:
 - a. Add the following statements to the "HAZARDS TO HUMANS AND DOMESTIC ANIMALS" section of the **PRECAUTIONARY STATEMENTS**:

"May be fatal if absorbed through the skin." and "Causes moderate eye irritation."
 - b. Under **ENVIRONMENTAL HAZARDS**, add as the first statement "This product is toxic to fish."
 - c. Check the temperature in the **STORAGE** section to verify that it is correct.
 - d. Modify the first sentence in the **PESTICIDE DISPOSAL** section to read "Pesticide wastes are toxic."

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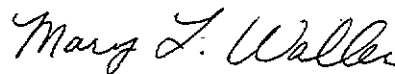
- e. Please submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release of the product for shipment constitutes acceptance of these conditions. A stamped copy is enclosed for your records.

- 2. The revised data (MRID 44459101) submitted on the description of the production process (Guideline No. 830.1620) for sodium N-methyldithiocarbamate are acceptable. The data (MRID 44477001) submitted on the analytical method to verify certified limits (Guideline No. 830.1800) satisfy the data requirements of 40 CFR sec. 158.180 and are acceptable. Please refer to the enclosed reviews dated 03/04/98 and 03/09/98 for specific comments.
- 3. In addition, acute toxicity data (MRIDs 42808301, 42819001 - 42819002) and found them to be acceptable. Please refer to the enclosed review dated December 16, 1997 for specific comments.

If you have any questions, then please contact Terri Stowe of my staff at (703) 305-6117.

Sincerely yours,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505C)

Enclosures

METAM-FLUID MANUFACTURERS CONCENTRATE

For The Formulation of End-Use Products

ACTIVE INGREDIENT	
Sodium methyl dithiocarbamate	42%
Inert Ingredients	58%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

PRECAUTION AL USUARIO: 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.)

EPA Reg. No. 52251-41
EPA Establishment No. 61464-WV-001

STATEMENT OF PRACTICAL TREATMENT

If on Skin: Immediately flush skin with large amounts of running water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately.

If in Eyes: Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.

If Inhaled: Remove victim to fresh air and get medical treatment.

If Swallowed: Call a physician or Poison Control Center. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

NET CONTENTS: 55 GALLONS

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUN 9 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended for the pesticide
registered under EPA Reg. No. 52251-41

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive, causes skin irritation. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Wash thoroughly with plenty of soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing the 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.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place. Keep container closed when not in use. DO NOT STORE BELOW 0° F. Product crystallizes at lower temperature. Warm or store at higher temperatures and mix to redissolve crystals and assure uniformity before use.

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 container (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

OREGON-CALIFORNIA CHEMICALS, INC.
29454 MEADOWVIEW ROAD
JUNCTION CITY, OR 97448

DIRECTIONS FOR USE

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

MANUFACTURING USE

Dilute this product with water or a miscible solvent system to the concentration of active ingredient specified on the label of currently registered end-use products containing metam sodium, such as the following types of products:

Fumigant solutions for the suppression of weeds, fungi and nematodes in soil of ornamentals, food and fiber crops.

Fumigant solutions for suppressing decay and insects in wood.

Anti-Microbial agents.

Products to control roots and fungi in sewers.

Each formulator is responsible for obtaining and maintaining EPA registration for their formulated product(s). Labeling for products formulated for applications around homes and other structures which people inhabit or otherwise occupy must include appropriate wording for "Restricted Use Pesticides" and will include small-area applications such as, non-field application (including greenhouse) to seed bed, plant beds, lawns and other limited areas.

CONDITIONS OF SALE - LIMITED WARRANTY AND LIMITATIONS OF LIABILITY AND REMEDIES

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions, the failure to follow the label directions, or good application practices, all of which are beyond the control of Oregon-California Chemicals, Inc. or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. Oregon-California Chemicals, Inc., warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of Oregon-California Chemicals, Inc. Oregon-California Chemicals, Inc. makes no other warranties or representations of any kind, express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose. The exclusive remedy against Oregon-California Chemicals, Inc. for any cause of action relating to the handling or use of this product is a claim of damage and in no event shall damages or any other recovery of any kind against Oregon-California Chemicals, Inc. exceed the price of the product which causes the alleged loss, damage, injury, or other claim. Oregon-California Chemicals, Inc. shall not be liable and any and all claims against Oregon-California Chemicals, Inc. are waived, for special, indirect, incidental, or consequential damages or expense, of any nature, including, but not limited to, loss of profits, or income, whether or not based on Oregon-California Chemicals, Inc. negligence, breach of warranty, strict liability in tort or any other cause of action. Oregon-California Chemicals, Inc. and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.



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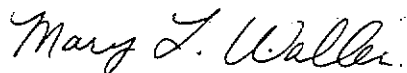
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