

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 22, 2003

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17 5-635575

Ciba Specialty Chemicals Corp.  
4090 Premier Drive  
High Point, NC 27265

Attention: Mr. Thomas Barber

**Subject: Mitin® FF High Conc.**  
**EPA Reg. No. 70404-1**  
**Revised Label**  
**Your letter of May 1, 2003**  
**Our letter of April 17, 2003**

**Purpose** The purpose of this submission is to revise the labeling according to our April 17, 2003, letter. Also, we have provided updated precautionary labeling based on a review of the acute toxicity data previously submitted to EPA in 1991, and requested copies of past communications concerning this product.

**Review of label** The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that you make the following labeling changes and submit one (1) copy of final printed labeling to us before you release product for shipment. A copy of the stamped label is enclosed for your records.

1. Based on our review of your acute toxicity data (copy enclosed), revise your "CAUTION" section as follows:

**WARNING.** May be fatal if swallowed. Harmful if absorbed through the skin. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with skin, eyes or clothing. Wear protective eyewear, long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminate clothing before reuse.

**Review of label-continued** 2. Under your "FIRST AID" text, you may delete the "If inhaled" section because the inhalation toxicity is only in Toxicity Category 4.

**Existing stocks** Stocks of existing labels may be used for eighteen (18) months.

**Consequence for non-compliance** If these conditions are not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

**Acute toxicity data** A review of the administrative history of this product revealed that the registrant had submitted a complete set of acute toxicity data (MRID Nos. 422494-01 to -06) in 1991 to our Special Review and Reregistration Division (SRRD). The Agency reviewed these data in 1995 and recorded the following results:

<u>Study</u>	<u>MRID No</u>	<u>Toxicity Category</u>
Acute Oral	422494-01	2
Acute Dermal	422494-02	3
Acute Inhalation	422494-03	4
Eye Irritation	422494-04	3
Skin Irritation	422494-05	4
Dermal Sensitization	422492-06	Not a Sensitizer

We have enclosed a copy of our review.

**Past communications** A review of the administrative history of this product reveals that we have no correspondence for this product between 1948 and September 24, 1964, a span of 16 years. Please review your records and supply us with any available correspondence so that our administrative record will be more complete.

**Questions** If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or [peacock,dan@epa.gov](mailto:peacock,dan@epa.gov) (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7504C)

**Enclosures** 1. Stamped label  
2. Minimum Type Size Requirements for Final Printed Label  
3. Our 1995 acute toxicity review

**Letter location** Disk 105,A:\Mitin FF\70404-1, revised label, 5-22-2003.wpd, May 22, 2003



Ciba

## MITIN® FF HIGH CONC.

### Moth Proofing Compound

For Wool Treatment

#### ACTIVE INGREDIENT

Sodium 5-chloro-2-[4-chloro-2-[3-(3,4-dichlorophenyl)-ureido]phenoxy]

Benzenesulfonate.....78.8%

INERT INGREDIENTS .....21.2%

Total: 100%

EPA Reg. No. 70404-1 EPA Est. 34733-SW-1

Keep Out of Reach of Children

## CAUTION

See additional precautionary statements and directions for use on the side panel.

Mitin® trademark of Ciba Specialty Chemicals Corporation

Net Weight: Pounds/Kg

#### CONDITIONS OF SALE AND WARRANTY

The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Ineffectiveness, or other unintended consequences may result because of such factors as presence of other materials,

or the manner of use or application all of which are beyond the control of Ciba Specialty Chemicals or the Seller. All such risks shall be assumed by the Buyer. Ciba Specialty Chemicals warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. Ciba Specialty Chemicals makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall Ciba Specialty Chemicals or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. Ciba Specialty Chemicals and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of Ciba Specialty Chemicals.

**Important:** Read the entire directions for use before using this product.

#### DIRECTIONS FOR USE

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

**USE RESTRICTIONS:** For mothproofing of wool.

#### PRE-TREATMENT DIRECTIONS:

1. Selection of Application Rate  
Select application rate [product wt (lb)/dry wool wt (lbs)]: 1 – 1.5%
2. Amount of Product Needed  
Multiply dry wool wt (lbs) by the application rate (1 – 1.5%)

#### MIXING DIRECTIONS:

- Dissolve Mitin FF High Conc. into boiling water at the rate of 1 lb Mitin to 5 gals water.
- Boil for less than two min after introducing the Mitin into water.

#### APPLICATION DIRECTIONS:

1. Adjust temperature in the dye bath to 90F to 100F
2. Add Mitin solution created above and run for 5 min.
3. Add 2% acetic, formic, or sulfuric acid followed by the necessary dyestuff, salt or additional acid, run 5 min.
4. Raise slowly to dyeing temperature and proceed as usual with the dye.

Note: Fixation temperatures [160 to 212F (best)]

#### STORAGE AND DISPOSAL

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

**STORAGE:** Store only below 130F in original container, in a dry place inaccessible to children, pets and domestic animals and where spills and leakage can be contained.

#### SPILLS:

1. **Minor Spills:** Shovel into approved disposal container and vacuum contaminated areas. Avoid creating dusty conditions. Take special care to avoid contamination of equipment and facilities during clean up procedures and disposal of wastes.
2. **Major Spills, Fires, Other Emergencies:** Call (800) 873-1138 anytime.

**PESTICIDE DISPOSAL:** Improper disposal of excess pesticide 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

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

MAY 22 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
70404-1

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Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to lessen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

**PRECAUTIONARY STATEMENTS**

**Hazard to Humans and Domestic Animals**

**CAUTION** Harmful if swallowed or inhaled. Avoid breathing dust. Wash thoroughly with soap and water after handling.

**Environmental Hazards:**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public 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.

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-873-1138 for emergency medical treatment.

<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have a person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>

Ciba Specialty Chemicals Corporation  
High Point, North Carolina 27265  
24-Hr. Emergency Phone 800-873-1138