

70907-19

12/22/2003

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

DEC 22 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Frank E. Sobotka
Agent for Gharda USA, Inc
IPM Resources LLC
660 Newtown-Yardley RD, Suite 105.
Newtown, PA 18940

Subject: Label Amendment: First Aid, Disposal, etc.
Chlorpyrifos Technical
EPA Reg. No. 70907-19
Submissions dated July 7, 2003, accepted with comments.

Dear Dr. Sobotka:

The labeling referred above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments specified this letter as listed below:

- 1) The REI listed for Tree nuts and sweet potatoes is 24 hours. Therefore, the 2 days restriction should be deleted. Add REI for cauliflower:3 days
- 2) The Direction for Use for termite control must exclude any post-construction application including spot and local treatment which were the only post construction uses allowed until December 31, 2002. Therefore, the forth paragraph from the bottom of page 3 must be amended to say that no post construction application is allowed.

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

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,

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

Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch
Registration Division (7505C)

cc: Tom Myers, SRRD
Jane Mitchell, SRRD

CHLORPYRIFOS TECHNICAL

AN INSECTICIDE FOR FORMULATING USE ONLY

Active Ingredient:

Chlorpyrifos

O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) phosphorothioate..... 99.3%

Inert Ingredients:..... 0.7%

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
DEC 22 2003

READ ALL DIRECTIONS BEFORE USING

KEEP OUT OF REACH OF CHILDREN

WARNING

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
70907-19

FIRST AID Organophosphate Insecticide	
If inhaled:	<ul style="list-style-type: none"> ▪ Remove person to fresh air. ▪ If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. ▪ Call a poison control center or doctor for further 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 a poison control center or doctor for treatment advise.
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 a poison control center or doctor for treatment advise.
If swallowed:	<ul style="list-style-type: none"> ▪ Call 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 do so by the poison control center or doctor. ▪ Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER (Organophosphate Insecticide)	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information call: 1-(866)-359-5660	
NOTE TO PHYSICIAN	
Chlorpyrifos is a cholinesterase inhibitor. Initial treatment measures include removal of secretions, maintenance of a patent airway and, if necessary, artificial respiration. When cyanosis is relieved, atropine may be administered in large therapeutic doses, repeated as necessary to the point of tolerance. If symptoms warrant further treatment, protopam chloride (pralidoxime chloride, 2-PAM chloride) has shown utility as adjunctive therapy. Never use morphine. Continued absorption of the poison may occur, resulting in a fatal relapse after initial improvement in condition. Close supervision of the patient is indicated for at least 48 to 72 hours.	

See additional precautionary statements on side panel.

Gharda USA, Inc.
Newtown, PA 18940

EPA Reg. No. 70907-19
EPA Est. No. 33658-IND-3
Net Wt. 625 lbs. (283.5 KGS)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. May be fatal if swallowed. Do not take internally. Harmful if absorbed through the skin. Avoid breathing vapors or spray mist. Handle concentrate in a ventilated area. Causes eye irritation. Do not get into eyes. Avoid contact with skin. Wash thoroughly with soap and water after handling. Do not wear contaminated clothing. Keep away from food, feedstuffs and water supplies.

Environmental Hazards

This pesticide is extremely toxic to fish and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

FOR MANUFACTURING USE ONLY

CHLORPYRIFOS TECHNICAL may be used only for formulation into other manufacturing-use products or end-use products for uses accepted by the United States Environmental Protection Agency. Because of their properties and intended uses, insecticidal formulations containing CHLORPYRIFOS TECHNICAL will require precautionary labeling different 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 registrations of these products.

CHLORPYRIFOS TECHNICAL MAY BE FORMULATED ONLY INTO END-USE PRODUCTS WITH THE FOLLOWING USES ON THE LABEL:

This product may only be formulated for the agricultural uses listed below if the EPA-approved labeling of the formulated product bears revised worker reentry intervals (REIs) of a duration no less than the following:

For all crops: 24 hours, unless specifically noted otherwise below

Tree nuts and sweet potatoes: 2 days

Fruit trees: 4 days

Citrus trees: 5 days

The end-use product labeling may include the following statement: "Certified crop advisors or persons entering under their direct supervision under certain circumstances may be exempt from the early reentry requirement pursuant to 40 CFR Part 170."

Agricultural Uses - Alfalfa, Asparagus, Christmas Tree Plantations, Citrus Fruits, Corn (field, sweet and seed corn), Cotton, Cranberries, Figs, Grapes, Mint, Onions (dry bulb), Peanuts, Sorghum, Soybeans, Sunflowers, Sugar Beets, Strawberries, Sweet Potatoes, Tobacco, Tree Fruit, (apples [pre-bloom only], pears, cherries, plums/prunes, peaches and nectarines), Tree Nuts (almonds, filberts, pecans, and walnuts), Vegetables (cauliflower, broccoli, Brussels sprouts, cabbage, collards, kale, kohlrabi, turnips, radishes, and rutabagas), and Wheat.

Non-Agricultural Uses – Termiticides (pre-construction, and post-construction spot and local treatment only); Non-Residential Outdoor Wood Treatment (fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, wooden containers, poles, posts and processed wood products); Non-Residential Outdoor Pest Control (golf courses, road medians, and industrial plant sites); Individual Fire Ant Mound Treatment for Public Health Uses; and Non-Residential Ornamentals (flowers, shrubs, vines, shade & flowering trees, and evergreens), Road Medians, and Industrial Plant Sites

ANY USE TO FORMULATE MANUFACTURING-USE OR END-USE PRODUCTS INTENDED FOR POST-BLOOM SPRAY USE ON APPLES, TOMATOES, INDOOR, GREENHOUSE, NURSERY GROWN ORNAMENTALS, PAINT ADDITIVE, PET CARE, ANIMAL HEALTH, OR FOR MOSQUITO CONTROL IS STRICTLY PROHIBITED.

ALL MANUFACTURING-USE PRODUCTS PRODUCED FROM THIS PRODUCT MUST BEAR A STATEMENT PROHIBITING FORMULATION OF SUCH PRODUCTS FOR THE USES IDENTIFIED ABOVE.

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.

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

This product may not be used after December 31, 2004, to formulate any product labeled for termite control, unless, prior to that date, EPA has made a written determination that pre-construction termite control use may continue.

Any end-use product formulated from this product must bear EPA-approved labeling that (a) does not include use instructions for any post-construction applications other than spot and local treatment; and (b) states this product may only be used for spot and local treatment until December 31, 2002.

Any end-use product formulated from this product must bear EPA-approved labeling with a maximum chlorpyrifos end-use dilution of 0.5% active ingredient.

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 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.

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 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 product may not bear use directions for any residential outdoor use other than one or more of the following public health uses: individual fire ant mound treatment.

The product may not bear use instructions for any non-residential outdoor use other than one or more of the following uses:

- (a) golf courses, road medians, and industrial plant sites, provided that the maximum label application rate is no greater than 1 lb./ai per acre;
- (b) individual fire ant mound treatment for public health purposes; and,
- (c) fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, wooden containers, poles, posts and processed wood products.

Use of this product for formulation into any end-use product bearing instructions for use on apple trees is prohibited unless the end-use product bears EPA-approved labeling prohibiting post-bloom application to apple trees.

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 must either be labeled as restricted use or packaged in containers no smaller than 15 gallons of a liquid formulation, 50 pounds of a granular formulation, or 25 pounds of any other dry formulation.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Storage: Store in a cool, dry area away from heat or open flame. Protect from moisture. Avoid contamination with water, acids, or alkalis. Keep container closed. Store in original container in locked storage area.

In Case of Spill: Isolate the spill. Hold this package, other cargo and vehicles involved. For Emergency spill assistance call CHEMTREC (24-hour service) : 1-800-535-5053.

Pesticide Disposal: Rinse spray equipment. Any pesticide, spray mixture, or rinse water that cannot be used according to label instructions or chemically reprocessed should be disposed of in a landfill approved for pesticides.

Container Disposal: Triple rinse (or equivalent), perforate rinsed containers and offer for disposal in a landfill approved for pesticide containers. Do not reuse containers. Do not cut or weld container.

General: Consult Federal, State or local disposal authorities for approved alternative procedures.

NOTICE OF WARRANTY

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This product is not registered in California or Arizona. California and Arizona law prohibits sale, distribution, and use within the State of any product not registered by the State.

Seller warrants that at the time of delivery the product in this container conforms to its chemical description contained hereon and is reasonably fit for its intended purpose only when used in accordance with proper manufacturing practices and procedures and under normal conditions of use. This is the only warranty made on this product. Seller expressly disclaims any implied warranties of merchantability or fitness for any particular purpose and, except as set forth above, any other express or implied warranties. Any damages arising from breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid for this product by Buyer, and shall not include incidental or consequential damages such as, but not limited to, loss of profits or values. It is impossible to eliminate all risks inherently associated with the use of this product. In no case shall Seller be liable for the consequential, special, or indirect damages resulting from the use or handling of this product. The Buyer shall assume all such risks. 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.

August 14, 2000
Revised: 04/15/03