

71645-2

12-21-99

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December 21, 1999

Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

Attention: Mr. James E. Downes

Subject: Santochlor Molten Insecticide
EPA Reg. No. 71645-1
Santochlor 20 Insecticide
EPA Reg. No. 71645-2 ✓
Your letters of February 12 and October 11, 1999

361 5-571244
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361 5-572846
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Thank you for the above two letters. This is our first opportunity to review your February 12, 1999, letter and your rationale for not including the following statement on your label:

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

You argued that "To place this statement on our label would violate US EPA policy that it will not regulate paradichlorobenzene as a carcinogen." and that the text does not track the California statute exactly.

The reason that EPA has allowed the above statement on PDB products was as an accommodation to registrants of such products who sold product in California. They were faced with a choice of identifying the state's concern about its carcinogenicity at the point of sale or on the product label. Registrants choose to put the warning on its label, and EPA agreed to that choice. Since such notices are only mandatory for "consumer products", it would not be necessary for the statement to appear on a manufacturing-use product.

As to the exact wording of the statement, it was the text that our Office of General Counsel worked out with the first registrants to seek such a labeling statement.

The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling with the following changes before you release the product for shipment:

1. On the Front Panel, modify the statement under your product name as:

An Insecticide for Formulation into Registered End-Use products for Indoor, Domestic Use for Control of Clothes Moths and Carpet Beetles.

2. Revise your Ingredient Statement to match your last accepted Confidential Statement of Formula (CFR), as follows:

ACTIVE INGREDIENT:
Paradichlorobenzene 99.94%

INERT INGREDIENTS:06%
TOTAL 100.00%

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3. After your "Environmental Hazards" section, add the two sentences currently under "WARNING", as follows:

Physical or Chemical Hazards

Hot material can cause thermal burns. Combustible vapor and liquid.

4. Add the following "Directions for Use" section before your "Storage and Disposal" text:

DIRECTIONS FOR USE

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

A Insecticide only for Formulation into Registered End-Use Products for Indoor, Domestic Use for Control of Clothes Moths and Carpet Beetles.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



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

- Enclosures: 1. Stamped Label
2. Minimum Type Sizes for Final Printed Labels

Santochlor 20 Insecticide

An Insecticide only for Formulation into Registered End-Use Products for Indoor Use Patterns.

ACTIVE INGREDIENT:

Paradichlorobenzene 99.9%

INERT INGREDIENTS: .1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN ACCEPTED with COMMENTS in EPA Letter Dated:

WARNING

DEC 21 1999

PRECAUTIONARY STATEMENTS

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

71645-2

Hazards to Humans and Domestic Animals

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory tract irritation. Wear goggles or face shield. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Combustible vapor and liquid. Excessive exposure may cause liver and kidney damage.

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. If symptoms persist, get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental hazards

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 the 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: Product will melt at 127°F. Do not store at elevated temperature. In case of leak or spill, sweep up or shovel into clean metal containers for disposal.

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.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

EPA Registration Number: 71645-2

EPA Establishment Number: 1475-MO-1

JED: 2/12/99