JAN 24 1992

SURECO, Inc. c/o Ms. Linda Watson Pesticide Regulatory Services Route One, Box 143-A Highway 122 / Banks Lake Lakeland, GA 31635

Dear Ms. Watson:

Subject: Amendments - Revise per Registration Standard;
Add use: tobacco transplant solution
Sureguard 20% Lindane Emulsifiable Concentrate
EPA Reg. No. 769-159
Your submission dated March 26, 1991

The amendment referred to above, submitted in connection with a registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided the following revisions are made prior to release for shipment under the amended labeling (please note that the quotation marks appearing around text specified in this letter should not be reproduced on your finished label):

- 1) The added use directions should be expanded to include the following after "...mixture to the acre.: "From tobacco setter water tank, move transplanting water through hose to setter shoe and dispense onto roots of plant mechanically as setter fingers release plant and plant roots are covered with soil inside setter shoe.".
- 2) Add the following as the first sentence of the "Note" for the tobacco use (retain the current sentence about root crops as the second sentence of this Note): "Do not dip tobacco roots directly into solution because root damage may occur."
- In the Environmental Hazards, replace "Do not apply directly to water or werlands." with the following: "Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark.".

Please note that the referenced similar product, Tobacco States 20% Lindane, EPA Reg. No. 226-68 (incorrectly identified as 266-68 in your cover letter) has been canceled. Your application has been processed based on similarity to Rigo Transplant Solution, EPA Reg. No. 70-205.

A stamped copy of the label is enclosed for your records. Please submit five copies of the revised amended label prior to release for shipment under the amended label. Please note that additional label revisions may be required in the future by the Reregistration Eligibility Document for Lindane as part of the reregistration process.

Sincerely yours,

George T. LaRocca Product Manager (13) Insecticide Rodenticide Branch Registration Division (H7505C)

RESTRICTED USE PESTICIDE

The use of this product may be hatardous to your health. This product contains lindane, which has been determined to cause tumors in laboratory animals. Risks can be reduced by closely following the use directions and precautions, and by wearing the protective clothing specified elsewhere on this label.

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

SUREGARD 20% LINDANE Emulsifiable Concentrate

Contains 1.65 pounds Lindane per gallon. Contains Aromatic petrolsum distillate solvent.

EPA Reg. No. 769-159

EPA EST. 769-GA-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

IN INHALED: Remove victim to fresh air. Apply respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash contaminated skir with soap and water.

IF IN EYES: Flush eyes with plenty of water. Get medical attention immediately.

NOTE TO PHYSICIAN: Product contains a light hydrocarbon solvent which presents an aspiration hazard. Gastric levage may be indicated if product was taken internally.



ACCEPTED
with COMMENTS
in ZPA Letter Dated:

JAN 24 1992

Under the federal harmands, Fungicide, and Rodenticides that amended, for the pesticide regulated under EFA Mag. No.

769-159

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTYON! HARMFUL IF SWALLOWED. May be absorbed through skin. Avoid inhalation and skin contact. Avoid contamination of feed and foodstuffs. Wash hands and face thoroughly after handling and before eating or smoking. Do not use on household pets or humans. Do not allow children and pets to go onto treated areas until spray has thoroughly dried.

CHEMICAL OR PHYSICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds, and other wildlife. Do not apply directly to water or wetlands. Drift and runoff from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes.

This pesticide is highly toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

DIRECTIONS FOR USE

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

PROTECTIVE CLOTHING REQUIRED: Applicators must wear the following protective clothing during the application process: a light-weight protective suit or coveralls; water-resistant hat; unlined, water-proof gloves; and unlined, light-weight boots. Mixers and loaders must also wear goggles or a face shield, waterproof gloves and a waterproof apron.

LIVESTOCK: CAUTION - Do not use on dairy animals. Do not treat animals under three months of age. Do not use on emaciated, sick, overheated, or lactating animals. Do not treat animals in cold stormy weather. Do not spray animals within 30 days of slaughter. Do not dip animals within 60 days of slaughter. Make sure animals are well watered prior to being dipped to prevent them from drinking the treated dip. Thoroughly stir dipping vats before using. If any separation of emulsion occurs do not use the dip.

BEEF CATTLE: Lice and Ticks - Use 1% pints per 100 gallons of water. Thoroughly spray entire animal using a sprayer capable of maintaining pressure of 200 to 400 pounds per square inch. Use one to two gallons of spray per head for cattle and proportionately less for smaller animals. SARCOPTIC MANGE AND SCAB MITES - Spray using 2 pints per 100 gallons of water. Make only 2 applications, 7 days apart. Do not apply to calves under 6 months of age at this dosage.

BEST AVAILABLE COPY

SWINE: Lice and Sarcoptic Mange Mites - Use 2 pints per 100 gallons of water and apply as a spray or dip. For MANGE MITES - Repeat treatment in 2 weeks if necessary. Do not treat sows within two weeks of farrowing nor for at least three weeks thereafter.

SHEEP AND GOATS: Ticks, Keds and Lice - Use 2 pints per 100 gallons of water as a spray or use 1 pint per 100 gallons in a dip. Repeat treatment in 2 to 3 weeks if necessary. Do not use on dairy goats.

DISPOSAL OF DIPS: Used dip solution must be disposed of in accordance with the Resource Conservation and Recovery Act (RCRA). If the applicator generates more than 1000 kg (260 gallons) of used dip solution per month or more than 1000 kg used dip solution in combination with other hazardous waste, the material must be treated as a hazardous waste subject to Subpart C of RCRA. Any user who wishes to treat, store or dispose of hazardous waste must obtain a permit to serve as a hazardous waste facility pursuant to RCRA.

RESIDUAL SPRAYS

STABLE FLIES, MOSQUITOES, ROACHES AND ANTS: Inside and outside of barns, hog pens, stables and other buildings, use 1% to 2 pints to 10 gallons of water and apply at the rate of 1 gallon to 1,000 square feet of surface. Thoroughly cover resting surfaces for flies and mosquitoes. Apply to cracks, crevices and other hiding places for control of roaches and ants. Repeat applications as necessary. Do not apply in milkrooms or poultry houses. Do not contaminate animals' feed or water.

TICKS AND CHIGGERS: Use 2 quarts per 100 gallons of water and spray weeds and underbrush harboring pests. Repeat applications as necessary. Do not use on food crops or grazing areas.

CRNAMENTALS

APHIDS, THRIPS, LEAFMINERS AND CUCUMBER BEETLES: On boxwood, azalea, rose, chrysanthemum, larkspur and other flowers, shrubs and ornamental trees, use one pint per 100 gallons of water or 1 teaspoon to 1 gallon of water.

LACEBUG: On azalea, pyracantha and rhododendron, use 15 pints per 100 gallons of water or 15 teaspoons to 1 gallon. Apply in spring when immature insects first appear and repeat as necessary.

PINE BARK BEETLES AND TURPENTINE BEETLES: Use 1 pint in 5 gallons of water and apply to trunk of pines to a height of 6 feet at the rate of 1 gallon to 50 square feet of bark surface. Apply at first sign of attack and repeat in 3 to 6 months if necessary. For application to ornamental pine trees only.

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DOGWOOD BORER: Use 3 pints per 100 gallons of water or 1 table-spoon to 1 vallon and apply to trunk and lower limbs in May and June before corers enter the trunk. Apply thoroughly, particularly to injured areas and old borer wounds. Repeat application 2 to 3 times at 10 day intervals.

LAWNS

TICKS, CHIGGERS, FLEAS AND LEAFHOPPERS: Use 1 pint to 10,000 square feet or 3 tablespoons to 1,000 square feet in sufficient water for good coverage. Repeat application if necessary. Birds feeding on treated areas may be harmed. Exclude children and pets from treated areas until spray has dried.

STORAGE AND DISPOSAL

STORAGE: Store pesticide in original container and place in a locked storage area. Opened pesticide containers should be securely resealed prior to storage. Protect from penetration of moisture, excessive heat or cold. Avoid cross-contamination with other pesticides or fertilizers. Use caution when storing pesticides in stacks.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are toxic. Improper disposal of excess posticide, 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 dispose of in a sanitary landfill or by other approved state and local procedures.

Manufactured For

SURECO, INC. 310 East Main Street Fort Valley, GA 31030



AMENDMENT

SUREGARD 20% LINDANE EMULSIFIABLE CONCENTRATE

EPA REG. NO. 769-159

ADDED USAGE

TOBACCO - Wireworms: Use 1 to 2 fluid ounces in 50 gallons of transplanting water depending on the type of soil. Apply at the rate of 1 pint to the plant or about 200 to 250 gallons of the mixture to the acre. This establishes a zone of protection around the roots of the newly set plants allowing them to become well established. Note: Do not apply this product to crops in rotation with root crops and peanuts.