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MEMORANDUM

DATE: May 14, 1981

SUBJECT: Orthocide 92 Seed Protectant Concentrate
EPA Registration No. : 239-2396

FROM: Sherell A. Sterling
FHB/TSS

TO: Henry Jacoby
Product Manager (21)

Registrant: Chevron Chemical Company
Ortho Division
940 Hensley St.
Richmond, CA 94801

Active Ingredients

Captan.....	87%
Related derivatives.....	5%
Inert Ingredients.....	8%

Background: An Eye Irritation study was submitted to support the proposed change in signal word. The latest accepted label bears the signal word CAUTION; based on the Eye Irritation study, the registrant proposes the signal word DANGER.

The study was conducted by Chevron's Environmental Health and Toxicology group of Richmond, California. The method of support is "alternate."

Recommendations:

1. The Eye Irritation study is adequate and acceptable for conditional registration purposes. Please note for future studies that this test must be run until irritation is no longer present or for 21 days, whichever occurs first.
2. Based on the Eye Irritation study submitted, DANGER is the appropriate signal word.
3. FHB/TSS wishes to point out that if the study period were extended (see # 1 above), this product may be shown to require only WARNING.

Labeling Recommendations:

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1. Please revise the "Hazards to Humans and Domestic Animals" section as follows:

DANGER. Corrosive. Causes irreversible eye damage. Harmful if swallowed. Avoid contact with skin. Avoid inhalation of dust. Wear a mask or pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Statement of Practical Treatment:

If in eyes: Flush with plenty of water. Get medical attention.

If swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Call a physician or Poison Control Center.

If on skin: Wash with plenty of soap and water. Get medical attention.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

These statements incorporate the new eye irritation studies and the precautionary statements from the latest accepted labeling.

2. The "Environmental Hazards" statements must be revised as follows:

This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes.

3. The "Storage and Disposal" statements should be revised according to the enclosed "Storage and Disposal" information sheets.

Review:

1. The Eye Irritation Potential of Captan Technical; SOCAL 1459/39: 26; July 27, 1979; Acc. No. 244713

Procedure: 9 New Zealand white rabbits each received 100 mg of "Captan Technical" in one eye. The eyes of 3 rabbits were rinsed for one minute with approximately 80 ml of distilled water, 30 seconds post-instillation of test material. Eyes were scored according to Draize's method at 24, 48, 72 hours; 4, 7, 10 and 14 days.

Results: In unrinsed eyes at 24 hours, corneal opacity observed in 3/6 = 10, 1/6 = 15; iris irritation in 4/6 = 5; redness in 6/6 = 3; chemosis in 3/6 = 1, 2/6 = 2, 1/6 = 3; discharge in 6/6 = 3. At day 7, unrinsed eyes exhibited corneal opacity in 1/6 = 5, 1/6 = 40, 1/6 = 60 with pannus in 3/6; redness in 3/6 = 1, 2/6 = 3; chemosis in 2/6 = 1; discharge in 3/6 = 1, 2/6 = 3. By day 14, corneal opacity still present in 1/6 = 10, 1/6 = 80 with pannus in 2 eyes; redness in 1/6 = 1; discharge in 1/6 = 1.

The washed eyes at 24 hours exhibited no corneal opacity; iris irritation in 2/3 = 1; redness in 3/3 = 3 with white necrosis in 1/3. The washed eyes at 7 days still exhibited corneal opacity in 1/3 = 20 and 2 with pannus; redness in 1/3 = 1, 1/3 = 2; discharge in 1/3 = 1. By day 14, only irritation noted was corneal opacity in 1/3 = 1 and 1 with pannus.

Study Classification: Core Minimum Data. Study should be continued until all irritation subsided or 21 days, whichever occurs first.

Toxicity Category: I-DANGER. Product may be shown to be II-WARNING if additional data are submitted (see above).

chemosis in 2/3=1, 1/3=3;
discharge in 1/3=1, 2/3=3



ORTHO

ORTHO[®] 92 Seed Protectant Concentrate

THIS PRODUCT IS FOR USE ONLY BY ECONOMIC POISON REGISTRANTS IN THE FURTHER PRECAUTION OF OTHER ECONOMIC POISONS NOT USE FOR ANY OTHER PURPOSE. This material is a polychlor agricultural fungicide

PRECAUTIONARY STATEMENTS 12 pt

HAZARDS TO HUMANS & DOMESTIC ANIMALS 12 pt

DANGER 12 pt

Corrosive to eyes. Causes eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes. Wear goggles when handling. Avoid contact with skin and clothing or inhalation of dust.

STATEMENT OF PRACTICAL TREATMENT 12 pt

In case of eye contact, immediately flush eyes with fresh water for 15 minutes and see a doctor. If swallowed, give a large amount of water to drink, make person vomit, and call a doctor. In case of skin contact, wash thoroughly with soap and water. If a skin rash develops, see a doctor.

Note to Physicians: Emergency Information — call (415) 233-3737.

ENVIRONMENTAL HAZARDS 12 pt

This product is toxic to fish.

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

STORAGE AND DISPOSAL 12 pt

PROHIBITIONS 12 pt

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

STORAGE 12 pt

Keep pesticide in original container. Store in cool, dry place. Protect from excessive heat. Do not store or transport near feed or food.

PESTICIDE DISPOSAL 12 pt

Pesticide, spray mixture, or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides or buried in a safe place away from water supplies.

CONTAINER DISPOSAL 12 pt

Dispose of in an incinerator or landfill approved for pesticide containers, or bury in a safe place.

Active Ingredients	By Wt.
*Captan	87%
*Related Derivatives	5%
Inert Ingredients	8%
*N-[trichloromethylthio]-4-cyclohexene-1,2-dicarboximide.	

KEEP OUT OF REACH OF CHILDREN 12 pt

DANGER 18 pt

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

NET WEIGHT _____

Chevron Chemical Company
Ortho Agricultural Chemicals Division

CONDITIONS OF SALE: Chevron Chemical Company warrants that this material conforms to the chemical description on the label. Chevron Chemical Company neither makes nor authorizes

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