

PM 13

70-205

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

MAR 7 1994

JOANN PRATT
WILBUR-ELLIS COMPANY
BOX 16458
FRESNO, CA. 93755

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 9/17/93 Response to PR Notice 93-7
EPA Reg. No. 70-205
RIGO TOBACCO TRANSPLANT SOLUTION

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

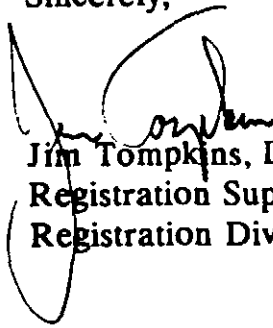
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Joann Pratt
WILBUR-ELLIS COMPANY
BOX 16458
FRESNO CA 93755

Comment for: EPA Reg Nr.70-205
RIGO TOBACCO TRANSPLANT SOLUTION

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

The glove requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or does not match the chemical-resistance category statement identified on your proposed labeling. Correct the chemical-resistance category (if necessary) to state: "Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category B on an EPA chemical resistance category selection chart." Remove the incorrect glove requirement (if any) and add "Chemical-resistant gloves, such as barrier laminate or butyl rubber." The exact location for each requirement is shown in Sections A and B on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

You have incorrect wording in the first paragraph in the Agricultural Use Requirements box on your proposed label. That paragraph must contain the exact wording of the paragraph shown as "2" in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

You have incorrect wording in the second-to-last sentence in the first pararaph in the Agricultural Use Requirements box on your proposed label. The sentence must be as follows: "It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval."

WILBUR-ELLIS COMPANY
EPA Reg. Number: 70-205
RIGO TOBACCO TRANSPLANT SOLUTION
Application date: 09/17/93
Original Submission

The glove requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Chemical-resistant gloves, such as barrier laminate or butyl rubber". The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

stcd
Label Tobacco Safety Rec @

"A"

PRECAUTIONARY STATEMENTS (Continued)
If indicated, if on side: Wash thoroughly with soap and water. If in eyes: Flush with water for at least 15 minutes. Call a physician immediately.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds, and other wildlife. Do not apply directly to water or wetland. 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.

PHYSICAL OR CHEMICAL HAZARDS

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

STORAGE AND DISPOSAL

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

STORAGE: Do not store in or around the home. Do not store or place product in direct or indirect sunlight or near heat or open flame.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, diluted mixture, or rinseate 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.

DIRECTIONS FOR USE

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

This product should be mixed in a well-ventilated area.

For protection of roots of newly set plants against wireworms and cutworms, mix and apply as follows:
MIXING: Mix 2 fluid ounces (4 Tablespoons) of Tobacco Transplant Solution in each 50 gallons of transplanting water.

APPLICATION: Apply this mixture at a rate of 1/2 pint per plant or about 250 gallons of the mixture per 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.

RESTRICTIONS: Do not dip tobacco roots directly into solution as root damage may occur. Do not make soil application to root crops, which might absorb a musty flavor. Do not apply in soil which will be planted to root crops (except potatoes) within 1 year. Do not use in soil which will be planted to potatoes within 2 years. Do not plant any food or feed crop in rotation after a field treatment with lindane unless it is a registered use for lindane.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

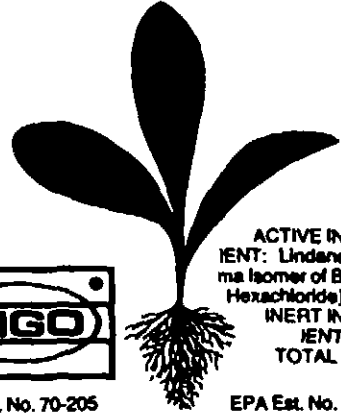
NET CONTENTS ONE PINT
Manufactured by RIGCO COMPANY, Buckner, Kentucky 40010
RMB

RIGCO'S BEST

TOBACCO TRANSPLANT SOLUTION

AGRICULTURAL INSECTICIDE

For control of wire and cutworms. Mix 2 gallons of solution approximately 16



ACTIVE INGREDIENT: Lindane (Gamma Isomer of Benzene Hexachloride) 10.0%
**INERT INGREDIENTS 90%
TOTAL 100.0%**

EPA Reg. No. 70-205 EPA Est. No. 70-KY-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See side panels for additional precautionary statements.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
CAUTION**

Keep out of reach of children. Harmful. Avoid contact with skin and eyes. May irritate the skin. Avoid contamination of food or feed. Do not use for food purposes. Do not use for feed purposes. Do not use for seed purposes. Do not use for seedling purposes. Do not use for seedling purposes. Do not use for seedling purposes.

STATEMENT OF PRACTICAL USE

If swallowed: Call a physician or Poison Control Center. Give victim one or two glasses of water. Induce vomiting by touching back of the tongue with a finger. Repeat until vomit fluid is clear. Keep patient warm. There may be an aspiration hazard. Do not induce vomiting or cathartics. Do not induce vomiting or cathartics. Do not induce vomiting or cathartics.

over to C*

Replace with Copy D

ACCEPTED with COMMENTS
In EPA Letter Dated

MAR 7 1967

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

70-205

BEST AVAILABLE

Personal Protective Equipment

Applicators and other handlers must wear:

- A) Coveralls over short sleeved shirt
and short pants
- B) Chemical-resistant gloves such as Barrier Laminate
- C) Shoes plus socks *+ other options*
- D) Protective eyewear
- E) Chemical-resistant headgear for overhead exposure.
- F) Chemical-resistant apron when
cleaning equipment, mixing or loading

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Add User Safety Rec. (C)

COPY D

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURE USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontaminations, notification, and emergency assistance. It also contains specific instructions, and exceptions pertaining to protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Personal

missing TRF

Do not enter or allow workers entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- A) Coveralls over shortsleeved shirt and short pants
- B) Chemical-resistant gloves such as Barrier Laminate + *add other option*
- C) Shoes plus socks
- D) Protective eyewear
- E) Chemical-resistant headgear for overhead exposure.

COPY F**Personal Protective Equipment**

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category B on an EPA Chemical resistance category selection chart.

Barrier Laminate + Butyl Rubber