



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

DEC 5 - 1995

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Mr. John J. Wrubel
Product Registrations Manager
American Cyanamid Company
Agricultural Research Division
P.O. Box 400
Princeton, NJ 08543-0400

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Mr. Wrubel:

Subject: Supplemental Labeling: Reduced PPE For Lock'n Load
Thimet 15-G Soil and Systemic Insecticide
EPA Registration No. 241-145
Thimet 20-G Soil and Systemic Insecticide
EPA Registration No. 241- 257
Your Application Dated June 7, 1995

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you submit one copy of your final printed label for each of the subject products incorporating the following corrections before you release the products for shipment.

1. Delete the following proposed reduced PPE for applicators: "When applying this product using the LOCK'n LOAD System, handlers are required to wear: Long-sleeved shirt and long pants, and Shoes and socks."

As specified in the 4th paragraph of item 4. below, it has been determined that the subject lock'n load container system qualifies as a closed loading system. Unless the product is applied with a closed application system such as an enclosed cab, applicators are not permitted to wear reduced PPE. If the product is to be applied with a qualifying closed application system such as an enclosed cab, the 3rd paragraph in item 4. below provides for such a situation.

2. Correct the phrase, "closed handling system" to read "closed loading system" in the sentence, "The LOCK'n LOAD System, when used correctly, qualifies as a closed handling system under the WPS."

3. Replace the word, "required" with the word, "permitted" in the reduced PPE instructions.

4. Rearrange and revise the Personal Protective Equipment (PPE) labeling to read as worded below.

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

"Personal Protective Equipment (PPE)

Applicators and other handlers must wear coveralls over long-sleeved shirt and long pants, waterproof gloves, chemical-resistant footwear plus socks, chemical resistant headgear for overhead exposure, protective eyewear, chemical-resistant apron when cleaning equipment, mixing, or loading and a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approved number refix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash Personal Protective Equipment separately from other laundry. Keep and wash PPE separately from other laundry. Wash all PPE after each day's use.

When handlers use closed systems, or enclosed cabs, in a manner that meets the requirements listed in the Worker Protection Standard (for agricultural pesticides (40CFR 170.2340 (d)(4 6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

The Lock'n Load system, when used correctly, qualifies as a closed loading system under the WPS. Mixer/loaders correctly loading this product using the Lock'n Load system are permitted to wear long-sleeved shirt and long pants, shoes and socks, a chemical-resistant apron, and waterproof gloves.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided with all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown. The PPE required for applicators and other handlers must be worn when performing all pesticide handling tasks other than loading and application, such as spill clean-up and equipment maintenance, cleaning and repair."

If this condition is not complied with, the registrations will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the products bearing the amended labeling constitutes acceptance of this condition.

A stamped copy of the label for each of the subject products is enclosed for your records.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (7504C)

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RESTRICTED USE CLASSIFICATION

Due to acute oral and dermal toxicity and avian hazards

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.

American Cyanamid Company endorses Certification to promote the responsible use of pesticides to insure the protection of man and the environment.

EPA Reg. No. 241-145

For use of THIMET 15-G with the LOCK'n LOAD[®] CLOSED HANDLING SYSTEM

DIRECTIONS FOR USE

BEFORE USING, READ PRECAUTIONARY STATEMENTS ON CONTAINER LABEL

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. THIMET 15-G should be applied with a granular pesticide applicator properly calibrated to assure placement and proper dosage. See label for specific instructions.

Cover granules that may be exposed on the ends of the treated rows, turns and loading areas by deep discing immediately after treating fields.

THIS LABEL SHOULD BE IN THE POSSESSION OF THE USER AT THE TIME OF PESTICIDE APPLICATION.

Personal Protective Equipment (PPE)

When handlers use closed systems or enclosed cabs, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The LOCK'n LOAD System, when used correctly, qualifies as a closed handling system under the WPS.

When mixing and loading this product using the LOCK'n LOAD System, handlers are required to wear:

- Long-sleeved shirt and long pants,
- Waterproof gloves,
- Shoes and socks, and
- Chemical-resistant apron.

When applying this product using the LOCK'n LOAD System, handlers are required to wear:

- Long-sleeved shirt and long pants, and
- Shoes and socks.

IMPORTANT: When reduced PPE is worn because a closed system is being used, applicators and other handlers must be provided with:

- Coveralls over long sleeved shirt and long pants,
- Waterproof gloves,
- Chemical-resistant footwear plus socks,
- Protective eye wear,
- Chemical-resistant headgear for overhead exposure,
- Chemical resistant apron, and
- A respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

The above PPE must be immediately available for use in an emergency such as a spill or equipment breakdown. This PPE must be worn when performing all pesticide handling tasks other than mixing, loading and application such as spill clean-up and equipment maintenance, cleaning and repair. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Wash all PPE after each day's use.

RESTRICTED
STATEMENTS
DEC 5 1995

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

