TEO STAN	Office of Festic Registratio Divi	sion (N7505C)	Number:	Date of Issuance:
	401 'Nº St. Washington, D	, S.V. .C. 20460	264-521	APR113 1993
	-t		Term of Issuance	:
	NOTICE OF PESTICI _x Registr		Conditiona	1
		tration	Name of Pesticid	e Product:
(under FIFRA, as	emended)		Nematicide	le
lame and * Tress	of Registrant (include ZIP Code	:):	.	2 12 168
P. O. Box	nc Ag Company 12014, 2 T.W. Alexa riangle Park, NC 2		543	1273 166
Note: Changes in be submitted to a	labeling differing in substance nd accepted by the Registration this product always refer to t	e from that accepted in co a Division prior to use of	f the label in com	registration must merce. In any
	nformation furnished by the reg stered under the Federal Insect			<i>w</i>
In order to prote cancel the regist with the registra	n no way to be construed as an ct health and the environment, ration of a pesticide in accord tion of a product under this Ac the name or to its use if it ha	the Administrator, on his dance with the Act. The a ct is not to be construed	s motion, may at an acceptance of any m as giving the reg	ny time suspend or name in connection
	product is condition 3(c)(7)(A) provide		ed in accord	dance with
reregistra Agency req data; and	ubmit and/or cite a tion of your produc uires all registran submit acceptable n oduct under FIFRA s	ct under FIFRA s nts of similar p responses requir	sec. 3(c)(5 products to) when the submit such
	ake the following 1 r shipment:	label changes bo	efore you r	elease the
a.	Add the phrase "El	PA Registration	No. 264-52	1".
inhalation	Revise the restric exposure so that i al, and inhalation	it reads as fol:	lows:"Due t	o acute
	Revise the stateme ed through the skin	n" to read as f	ollows:"Fat	alif
or absorb	inhaled, or absorb		-	
or absorb	inhaled, or absor		Date:	1 3 1993

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d. Delete the second p ragraph under the heading, "Danyer" starting with the sentence "Wear protective clothing___" and ending with the sentence, "Do not contaminate feed or food".

The statements contained in these paragraphs are either redundant or are in conflict with the statements required under the Phorate Registration Standard. Refer to the enclosed pages 43 through 47 of the Phorate Registration Standard and revise your label to include the required Personal Protective Equipment, Work Safety Rules, and Reentry headings and statements.

e. Relocate the instructions to wear a pesticide respirator under the new heading, Personal Protective Equipment" to be added to your label.

f. Revise the "Environmertal Hazards" statements to read as follows:

"This pesticide is extremely toxic to mammals, birds, fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Collect and incorporate granules that are spilled during loading or are visible on soil surface in turn areas. Do _ot contaminate water when disposing of equipment washwater or rinsate. The pesticide is 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."

g. Delete instructions to "Bury any small spills at least 18 inches deep in soil, isolated from water supplies and food crops" in case of spills. The user should be referred to the required "Pesticide Disposal" instructions when disposing of spills.

h. Change the word "should" to "must" in the following statement "Granules lying on the soil surface in turn areas at row ends should be incorporated to remove hazard to birds and other wildlife".

i. The following statement is not acceptable and must either be deleted or revised to reflect the maximum amount of the active ingredients phorate and ethoprop allowed to be applied to the crop per season rather than the prohibition of the use of other products.

"Do not use HOLDEM Brand Granular Nematicide-Insecticide if other products containing either ethoprop (MOCAP) or phorate have been or are expected to be used"

j. Replace the second paragraph under your existing heading, "General Worker Protection and Reentry Statements" with the reenry statements required under the Phorate Registration Standard. Also, replace your existing heading with the heading, "Reentry Statements"

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k. Correct the reentry interval from 24 hours to 48 hours in your written or oral warnings to workers.

1. Delete the reference to "_____supplemental labeling___" which appears on your label under the heading, " General Cautions and Restrictions". No "supplemental labeling" was received with your application for the subject product.

m. Add the following restiction to the directions for use on potatoes.

"Do not place in direct contact with seed."

3. Submit the following studies for ethoprop by the specified due dates.

<u>Guideline</u>	No. Study Tizle		<u>Due Date</u>
071-5(a)	Terrestrial Field Study	Oct.	1993
• •	Acute Neurotox-Rat		1994
082-5(b)	90-day Neurotox-Mammal	Oct.	1995
171-4 (d)	Residue SS(TGAI & Metabolites)	Aug.	1994
171-4(e)	Magnitude of Residue in Plants(TGAI & Metabolites)		
	Potato(processing)	Nov.	1994

4. Submit two copies of the revised final printed label before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA 6(e).Your release for shipment of the product constitutes acceptance of these conditions.

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

You are reminded that after April 21, 1994, your product must bear labeling statements as specified in the Federal Register of August 21, 1992 for worker protection (40 CFR Parts 156 and 170).

Sincerely yours,

RESTRICTED USE PESTICIDE

DUE TO ACUTE ORAL AND DERMAL TOXICITY AND BIRD TOXICITY For retail sale to and use only by Certified Applicators or persons under the direct supervision of a Certified Applicator, and only for those uses covered by the Certified Applicator's certification.

HOLDEM[®] Brand Granular

NOT FOR DOMESTIC USE

ACTIVE INGREDIENTS:

NALLE WALFALA.	
Ethoprop: 'O-Ethyl S, S-Dipropyl Phosphorodithioate}	
Phorate: (J,O-Diethyl S-((Ethylthio) Methyl) Phosphorodithioate)	
ribidio. (b)o biolifi o ((2a))ano) monifi i noopi oreenno ziefi	
INERT INGREDIENTS	

EPA REG. NO. 264-XXX

EPA EST. NO. 34704-NB-1



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KEEP OUT OF REACH OF CHILDREN DANGER POISON PELIGRO



PRECAUCION AL USARIO: Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado ampliamente. (PRECAUTION TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

For <u>MEDICAL</u> and <u>TRANSPORTATION</u> Emergencies <u>ONLY</u> Call 24 Hours A Day 1-800-334-7577 For <u>PRODUCT USE</u> Information Call 1-800-334-9745

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Give 1 or 2 glasses of water to drink and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Gall a physician, Poison Control Center or hospital emergency room. If not breathing, give mouth to mouth artificial respiration.

IF IN EYES: Flush eyes with plenty of water for at least 15 minutes and get medical attention.

IF ON SKIN: Immediately remove all contaminated clothing and wash skin with soap and water. Wash clothing before reuse. Discard contaminated shoes.

IF INHALED: Remove victim to fresh air. If not breathing, give mouth to mouth artificial respiration. Get medical attention immediately.

Call a physician immediately in all cases of suspected poisoning.

Persons providing first aid should prevent contamination of themselves.

NOTE TO PHYSICIAN

This product is a cholinesterase inhibitor. Severe symptoms and signs include diarrhea, pinpoint and non-reactive pupils, respiratory difficulty, pulmonary edema, cyanosis, loss of sphincter control, convulsions, and coma. Support respiration as needed. Measures should include removal of secretions, maintenance of a patent airway, $\epsilon =$ if necessary, artificial ventilation.

If cyanosis is absent, give ATROPINE 2-4 mg intravenously (0.05 mg/kg for children). Repeat atropine at 5-10 minute intervals until atropinization occurs (dry, flushed skin, tachycardia, pupillary dilatation), and maintain for 48 hours. If cyanotic, give initial atropine intramuscularly and start measures to improve ventilation.

Start 2-PAM (PROTOPAM, Ayerst) at the same time. Give 1-2 grams PROTOPAM (20-40 mg/kg for children) in 100cc subme over 15-30 minutes. If pulmonary edema is present, give intravenously slowly as a 5% solution in water over a period of at least 5 minutes. A second dose may be given after one hour if muscle weakness. Additional doses may be given cautiously for parsistent muscle weakness. May be given by intramuscular or subcutaneous routes if intravenous administration is not feacible.

in case of skin contact, wash patient with scap and water followed by wash with 95% ethyl alcohol. Keep patient under constant observation for 24-36 hours. Symptoms may persist for one month.

The use of theophylline, morphine, barbiturates, phenothiazines, reserpine, and succinyl carbline is contraindicated.

Allow no further exposure to any chloinesterase inhibitor until cholinesterase regeneration has taken place as determined by blood tests.



PRECAUTIONARY STATEMENTS

DANGER HAZARDS TO HUMANS AND DOMESTIC ANIMALS

FATAL If *i*WALLOWED, INHALED OR ABSORBED THROUGH SKIN. Do not breathe dust. Do not get in eyes, on skin or on clothing. Rapidly absorbed through skin. Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to poisoning.

Wear protective clothing including rubber gloves. It case of contact, wash immediately with soap and water. Do not breathe fumes or dust. Wear a mask or pesticide respirator jointly approved by the Mining Enforcement & Safety Administration and the National Institute for Occupational Safety and Health. After use, wash hands, arms and face thoroughly with soap and warm water before eating, drinking or smoking. Wash all clothing with soap and hot water before reuse. Discard contaminated shoes. Do not contaminate feed or food.

SIGNS AND SYMPTOMS OF OVEREXPOSURE: Nausea, vomiting, abdominal cramps, diarrhea, excessive salivation, headache, dizziness, weakness, blurring or dimness of vision, excessive tearing, loss of muscular coordination, slurring of speech, twitching of muscles (especially of tongue and eyelids), mental confusion, disorientation, drowsiness, difficulty in breathing (chest tightness), runny nose.

ANTIDOTE STATEMENT: ATROPINE IS AN ANTIDOTE. See "NOTE TO PHYSICIAN".

ENVIRONMENTAL HAZARDS

TOXIC TO FISH, BIRDS, AQUATIC INVERTEBRATES AND OTHER WILDLIFE. This product is toxic to fish, birds, aquatic invertebrates and other wildlife. Birds and other wildlife feeding in treated areas may be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Keep out of lakes streams and ponds. Do not contaminate water when cleaning equipment or disposing of wastes. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Cover or incorporate granules that are spilled during loading or are visible on soil surface in turn areas. Apply this product only as specified on the label.

ENDANGERED SPECIES

NOTICE: Under the Endangered Species Act, it is a Federal Offense to use any pesticide in a manner that results in the death of a member of an endangered species.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read the entire label before using this product.

GENERAL WORKER PROTECTION AND REENTRY STATEMENTS

Do not apply this product in such a manner as to directly expose workers or other persons. The area being treated must be vacated by unprotected persons.

Do not enter treated areas for 24 hours unless appropriate protective clothing, gloves and goggles are worn. Protective clothing means at least a hat or other suitable head covering, a long-sleeved shirt and long-legged trousers or a coverall type garment (all of closely woven fabric covering the body, including the arms and legs), shoes and socks.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. When oral warnings are given, warnings shall be given in a language customarily understood by workers.

Written or oral warnings must include the following information:

Danger

(Insert area or field description) treated with phorate and ethoprop on (insert date of application). Do not enter treated area for 24 hours unless appropriate protective clothing, goggles and gloves are worn. In case of accidental exposure: Call a doctor (physician), clinic or hospital immediately. Explain that the victim has been exposed to phorate and ethoprop and describe his condition. For further information see the "STATEMENT OF PRACTICAL TREATMENT" portion of the pesticide label.



STORAGE AND DISPOSAL

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ROHIBITIONS

Do not store in or around the home or home garden. Do not contaminate water, food or feed by storage disposal. Open dumping is prohibited. Do not reuse empty container. Do not store under conditions which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking, and prevention of moisture.

STORAGE

Store in a safe manner. Store in original container only. Store in a cool, dry, well ventilated place. Keep container tightly closed when not in use. Once bag has been opened use it completely. Reduce stacking height where local conditions, such as humidity or pallet overhang, can affect package strength. Personnel should use clothing and equipment listed under "PRECAUTIONARY STATEMENTS" when handling open containers.

SPILLED MATERIAL

* container is broken, before cleaning up, put on protective clothing and rubber gloves. Do not get granules on skin or in eyes. Do not z eathe dust. Always stand upwind from spills when cleaning up. Scoop and sweep into a disposable container. Bury any small spills at least 18 inches deep in soil, isolated from water supplies and food crops.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide granules, 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 Pesticides 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.

GENERAL CAUTIONS AND RESTRICTIONS

PRE-HARVEST, GRAZING AND ENVIRONMENTAL LIMITATIONS STATEMENTS

Use HOLDEM™ Brand Granular Nematicide-Insecticide only in accordance with label directions, warnings and cautions. DO <u>NOT</u> USE ON ANY CROP NOT LISTED ON THIS OR SUPPLEMENTAL LABELING AS ANY RESIDUES REMAINING MAY BE ILLEGAL OR HARMFUL. DO <u>NOT</u> STORE OR USE IN OR AROUND THE HOME OR HOME GARDEN.

POTATO

- TO AVOID ILLEGAL RESIDUES:
 - *Do not make more than one application per year.
 - *Do not harvest within 90 days of application.

*Do not use HOLDEMTM Brand Granular Nematicide-Insecticide if other products containing either ethoprop (MOCAP®) or phorate have been or are expected to be used.

*Minimum row spacing 32 inches.

APPLICATION STATEMENTS

Calibrate and adjust application equipment to insure proper rate and accurate placement. Clean application equipment thoroughly after use. For any leftover material, see instructions for "STORAGE AND DISPOSAL".

Granules lying on the soil surface in turn areas at row ends should be incorporated to remove hazard to birds and other wildlife.

SPECIFIC USE DIRECTIONS

POTATOES				
CROP	APPLIC. TIMING	PESTS CONTROLLED	RATE OF HOLDEM™	APPLICATION DIRECTIONS
POTATO	At planting	Aphids Leathoppers Wireworms Lesion nematode Suppression of Colorado potato beette	2.1 lb per 1000 linear foot of row	Apply in the open furrow using a 6 inch row bander placed immediately behind the opening shoe and ahead of closing disks. Uniformly distribute granules in the furrow, level with and directly behind seed pieces.

ACCEPTED with COMMENTS in EPA Letter Dated:

APR 13 1993

Under the Foderal Insectacide, Fungicide, and Rodenticide Act as amended, for the posticide registered under SPA Rog. No. 2647-521

USE RATES AS POUNDS PER ACRE FOR TYPICAL APPLICATION RATES FOR VARIOUS ROW SPACINGS

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Row spacing in inches	2.1 Pounds/ 1000 Ft. of Row
40	26.9
38	28.3
36	29.9
34.	31.7
32	33.7

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

THIS WARPANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE (...F THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS, OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING F. YOM THE USE OF HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OR THIS PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside the United States.

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Rhône-Poulenc Ag Company P.O. Box 12014, 2 T.W. Alexander Drive Research Triangle Park, North Carolina 27709

HOLDEM is a trademark of Rhône-Poulenc Ag Company.

HOLDEMTH brand Granular Nematicide Insecticide (Pending) submitted 7/26/91.