



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

FEB 23 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Joanne Pratt
WILBUR ELLIS CO.
191 W. Shaw Avenue
Fresno, CA 93704

Subject: Label Amendment Submission of 09/15/93 in Response to PR Notice 93-7
EPA Reg. No. 2935-470
GRANOX CHM SOYBEAN SEED TREATMENT FUNGICIDE

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.

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

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Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

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IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:

Submit the required notification. Then 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 as amended

AND

- WITHIN one year from date of this acceptance.

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

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Hand or courier deliveries of final 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

cc: Office of Compliance Monitoring

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Joanne Pratt
WILBUR ELLIS CO.
191 W SHAW AVE
FRESNO CA 93704

Comment for: EPA Reg Nr.2935-470
GRANOX CHM SOYBEAN SEED TREATMENT FUNGICIDE

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

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

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 paragraph 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), notification to workers and restricted-entry interval."

The correct restricted entry interval (REI) for this product is 48 hours. Your REI statement must read: "Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours." The exact location is shown in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The bodywear 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 "Coveralls over long-sleeved shirt and long pants." 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.

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WILBUR ELLIS CO.
EPA Reg. Number: 2935-470
GRANOX CHM SOYBEAN SEED TREATMENT FUNGICIDE
Application date: 09/15/93
Original Submission

The eyewear 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 "Protective eyewear". 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.

The footwear 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 footwear plus socks." 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.

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 "Waterproof gloves". 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.

The headgear 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 headgear for overhead exposure." 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.

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ACCEPTED
with COMMENTS
In EPA Letter Dated

GRANOX[®] CHM

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Avoid contact with skin and clothing. Remove and separately launder clothing before reuse. Wash with soap and water after handling.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not clean equipment or dispose of equipment washwaters in a manner that will contaminate water resources. Do not apply directly to water areas where surface water is present or to intertidal areas below the mean high water mark. Exposed treated seeds may be hazardous to birds and other wildlife. In the event that treated seeds are spilled and cannot be salvaged, completely cover them with soil. Dispose of all excess treated seeds by burial away from bodies of water.

PRODUCT INFORMATION

GRANOX CHM, when used at the correct dosage rate, protects seeds from soil and seed-borne diseases that cause damping-off, seed decay, and seedling blights in soybeans. GRANOX CHM provides essential molybdenum for plant growth where soils are found to be deficient in available molybdenum.

ADD COPY D DIRECTIONS FOR USE

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

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

Application Instructions: Use GRANOX CHM on soybeans at 2 oz. per bushel (one scoop per bushel).

Planter Box Application: GRANOX CHM may be applied as a hopper box application.

1. Pour one bushel of seed into each planter box.
2. Pour enough GRANOX CHM on top of the seed to treat one bushel.
3. Then mix with an axe handle or paddle (an axe handle or paddle used for seed treatment purposes only).

Drill Box Application:

1. Fill drill box one-half full with seed and level and then apply one scoop of GRANOX CHM for each bushel in the drill.
2. Then mix thoroughly with an axe handle or paddle (an axe handle or paddle used for seed treatment purposes only).
3. Fill the remainder of the drill with seed and then apply remainder of GRANOX CHM and thoroughly mix once more.

Dry Treating Equipment: Be sure to calibrate the treating equipment to get correct rate applied to the seed.

Always apply GRANOX CHM to the seed prior to using any plantability aid for vacuum planters.

NOTE: Avoid very deep seeding and exceptionally early sowing under poor growing conditions for maximum benefits. Use only recommended rates. Lower amounts may not give the desired control. Regularly inspect planter plates of seed drill and clean as required. If coating of planter plate occurs (i.e. under conditions of high humidity), add small amounts of graphite to facilitate uniform seeding.

Clean-up for Electric Eye Population Monitors: At the end of each day of use, or as often as necessary, clean out the electric-eye monitors with brushes provided by the planter manufacturers, according to their directions. Under extremely humid conditions, the cleanup process may need to be done more often.

Treat seed outdoors or in a well ventilated area.

A dust mask must be worn when mixing and loading this product.

Wear goggles or face shield when handling.

Miners/loaders when mixing and loading this product must wear a long-sleeved shirt and long pants or a coverall that covers all parts of the body except the head, hands and feet. Wear chemical resistant gloves, goggles or a face shield and a chemically resistant apron.

Wilbur-Ellis Company recommends the use of a pesticide respirator jointly approved by the Mine Safety and Health Administration (formerly the U.S. Bureau of Mines) and by the National Institute of Occupational Safety and Health under provisions of 30 CFR, Part 11.

Wash thoroughly with soap and water after handling.

Always wash hands thoroughly after handling product or treated seed and before eating, drinking or smoking.

Always wash hands and arms with soap and water before using toilet facilities.

Always wash gloves with soap and water before removing them.

NET WEIGHT: 10 lbs.

In Case of Emergency, Call CHEMTREC 800/424-9300

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Distributed By: WILBUR-ELLIS, P.O. BOX 16458 • FRESNO, CALIFORNIA 93755

2935-470 HOPPER BOX SOYBEAN SEED TREATMENT FUNGICIDE WITH MOLYBDENUM

This product contains 9.5% molybdenum from sodium molybdate
For protection of seed-borne and soil-borne diseases in Soybean

ACTIVE INGREDIENTS	By Wt.
*Captan.....	48.89%
Related Derivatives.....	1.11%
INERT INGREDIENTS.....	50.00%
TOTAL.....	100.00%

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No. 2935-470

EPA Est. No. 70-KY-1

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO

STATEMENT OF PRACTICAL TREATMENT

If in eyes, flush with plenty of water. Call a physician.

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. Get medical attention.

If on skin, wash with plenty of soap and water.

If inhaled, remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

See side panel for additional precautionary information.

DIRECTIONS FOR USE (cont.)

AFTER WORK: Take off all clothes and shoes. Shower using soap and water. Do not wear contaminated clothing. Wash protective clothing and equipment with soap and water after each use. Personal clothing worn during use must be laundered separately from household articles. Clothing and protective equipment heavily contaminated or drenched with captan must be destroyed according to state and local regulations.

Remove contaminated clothing and separately launder clothing before reuse.

Avoid contamination of feed, food and foodstuffs.

Avoid contact with eyes by wearing goggles while loading or handling treated seed.

Treated seed must not be used for or mixed with food or animal feed, or processed for oil. Treat only those seeds needed for immediate use, minimizing the interval between treatment and planting. Do not store excess treated seeds beyond planting time.

STORAGE AND DISPOSAL

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

STORAGE: Keep container tightly closed when not in use. Store treated seed in a ventilated place away from water, food and feed.

Do not store with food for human consumption, feed or forage to be fed to any and all livestock animals.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, 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: Completely empty container into application equipment. Then dispose of empty containers in a sanitary landfill or by incineration if allowed by State and local authorities. If incineration, stay out of smoke.

CONDITIONS OF SALE

NOTICE: The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILBUR-ELLIS COMPANY does not make, nor does it authorize any agent or representative to make any warranty, guarantee or representation, expressed or implied, concerning this material or the use thereof, except in conformity with the statements on the label. Neither WILBUR-ELLIS COMPANY nor the seller shall be held responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on these conditions.

GRANOX is a registered trademark of ICI Canada, Inc.

Logo TM of WILBUR-ELLIS Company

IDEAS TO GROW WITH is a registered trademark of WILBUR-ELLIS Company

F-1092

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COPY B

Personal Protective Equipment
Applicators and other handlers must wear:

- A) Coveralls over long sleeved shirt and long pants.
- B) *Waterproof gloves.*
- C) Chemical-resistant footwear plus socks.
- D) Protective eyewear.
- E) Chemical-resistant headgear for overhead exposure.
- F) Chemical-resistant apron when cleaning equipment, mixing or loading.
- G) Dust/mist filtering respirator (MSHA/NIOSH approval prefix TC-21C).

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.

1311
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.

Do not enter or allow workers entry into treated areas during the restricted entry interval (REI) of _____ 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 long sleeved shirt and long pants
- B) Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber ≥ 14 mils, or Nitrile Rubber ≥ 14 mils.
- C) Chemical-resistant footwear plus socks
- D) Protective eyewear
- E) Chemical-resistant headgear for overhead exposure.

missin
image

→ Not
Applicable
to A
Seed
Treatment

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COPY II

User Safety Recommendations:
Users should:

- * Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- * Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- * Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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COPY I

a
Si usted no entiende la etiqueta,
busque a alguien para que se la
explique a usted en detalle (If
you do not understand the label
find someone to explain it to
you in detail).