



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

APR 14 1995

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

Joanne C. Striebich
WILBUR-ELLIS COMPANY
191 W Shaw Avenue - Suite 107
Fresno, CA 93704

**Subject: Label Amendment Submission of 05/18/94 in Response to PR Notice 93-7
EPA Reg. No. 2935-471
AGROSOL FLOWABLE SYSTEMIC COMMERCIAL SEED TREATMENT**

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

Page 2

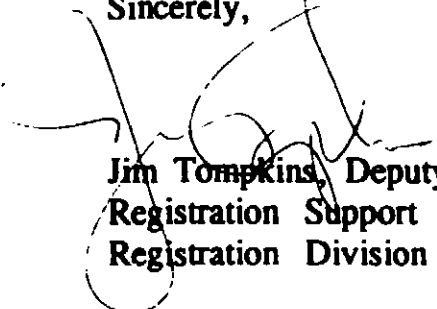
Submit the final printed labeling via the U.S. Postal Service to:

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

3.16
Comment for: EPA Reg Nr.2935-471

AGROSOL FLOWABLE SYSTEMIC COMMERCIAL SEED TREATMEN

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

The following statement on your proposed label is not required for this product: "Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate." You may delete it or leave it on the label.

Correct the typographical errors circled on your proposed label.



AGROSOL® FLOWABLE

Systemic Commercial Seed Treatment Fungicide
Contains Thiabendazole

ACTIVE INGREDIENTS

*Captan

Related derivatives

**Thiabendazole

INERT INGREDIENTS

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

**2-(4-Thiazolyl) benzimidazole

This product contains: 2.77 lb. captan per gallon

0.06 lb. related derivatives per gallon

0.05 lb. thiabendazole per gallon

EPA Reg. No. 2935-471

ACCEPTED

with COMMENTS

In EPA Letter Dated

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

2935-471

EPA Est

KEEP OUT OF REACH OF CHILDREN DANGER — PELIGRO

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.)
See side panel for additional precautionary statements.

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 solutions, or if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.
Note: This product contains a petroleum distillate.

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

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 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 or salvaged, completely cover them with soil. Dispose of all excess treated seeds by burial away from bodies of water.

PRODUCT INFORMATION

AGROSOL Flowable is a seed treatment fungicide specially prepared for commercial seed treatment. When used at the correct dosage rate, AGROSOL Flowable will protect soybeans from soil and seed borne diseases that cause damping-off, seed decay and seedling blights. The systemic action of the thiabendazole present in Agrosol will suppress pod and stem (app.) of soybeans during germination and early seedling stages. In wheat, AGROSOL Flowable suppresses seed-borne infections of scab and common bunt (stinking smut) during and early seedling stages.

DIRECTIONS FOR USE

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

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

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 or restrictions, your State or Tribe, consult the agency responsible for pesticide regulation.

NET CONTENTS: 2½ GALLONS

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

BEST COPY



PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. Do not get in eyes. Avoid contact with skin and clothing.

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 F on an EPA Chemical resistance category selection chart.

Applicators and other handlers must wear: A) Coveralls over long-sleeved shirt and long pants; B) Chemical-resistant gloves such as Barrier Laminale, Butyl Rubber, Nitrile Rubber, or Viton; 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.

Engineering Controls Statement: When handlers use closed systems, enclosed cabs, or aircraft 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.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) 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.

STORAGE AND DISPOSAL

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

STORAGE: Store above 32°F. Product stored at a lower temperature will reconstitute to satisfactory utility if warmed to approximately 70°F and thoroughly shaken or stirred before use. Store treated seed in a ventilated place away from water, food and feed.

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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

ACTIVE INGREDIENTS

*Captan
Related derivatives
**Thiabendazole

INERT INGREDIENTS...

*N-Trichloromethylthio-
**2-(4-Thiazolyl) benzimidazole

This product contains: 2
0
0

EPA Reg. No. 2935

Stusted no

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**ALWAYS READ THE ENTI
LATIONS.**

Do not apply this product in
your State or Tribe, consult

NET CONTENTS

By Wt.
----- 29.37%
----- 0.53%
----- 0.53%
----- 69.47%
TOTAL: 100.00%

AGRICULTURAL 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 and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. 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 requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 days.

EXCEPTIONS: For the last 48 hours of the REI, workers may enter the treated area to perform hand labor or other tasks involving contact with anything that has been treated such as plants, soil, or water, without time limit, if they wear the early entry personal protective equipment listed below. If the product is used for seed treatment, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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, nitrile rubber or viton; C) Chemical-resistant footwear plus socks; D) Protective eyewear; E) Chemical-resistant headgear for overhead exposure.

No. 32761-MO-3

SHAKE OR STIR WELL BEFORE USING. Use at temperatures above 40°F.

SOYBEANS: Use AGROSOL Flowable in liquid and slurry treaters at the rate of 1.5 fl. oz. per bushel of soybean seed (2.5 fl. oz. per 100 lbs. of soybean seed).

WHEAT: Use AGROSOL Flowable in liquid and slurry treaters at the rate of 1.5 fl. oz. per bushel of wheat seed (2.5 fl. oz. per 100 lbs. of wheat seed).

NOTE: The purchaser of this product is responsible for insuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye added must be cleared for use under 40 CFR, Part 180.1001.

Avoid contamination of feed, food and foodstuffs. Do not allow livestock to graze or feed on treated green wheat forage. Do not graze or feed treated soybean vines or hay to livestock. Do not tank mix or apply in combination with copper fungicides.

Treated seed must not be used for or mixed with food or animal feed, or processed for oil. Seed commercially treated with AGROSOL Flowable must be labeled in accordance with all applicable requirements of the Federal and State seed laws.

NOTICE - READ CAREFULLY

CONDITIONS OF SALE AND LIMITED WARRANTY STATEMENT

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, guaranty 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.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, except for the purpose of curative control of existing disease or insect pests, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Wilbur-Ellis, no claims are made to guarantee germination of carry-over seed.

AGROSOL is a trademark of a Zeneca Group Company
WILBUR-ELLIS® and IDEAS TO GROW WITH® are trademarks of WILBUR-ELLIS Company

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