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JUN 8 1990

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Mr. V. Bruce Jones
Chapman, A Business Unit of C-I-L Inc.
P.O. Box 9910 Stony Creek
Ontario, Canada L0G 3Z1

Dear Mr. Jones:

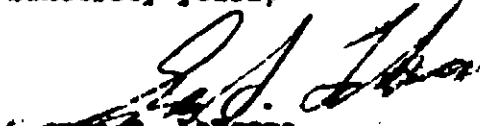
Subject: Amendment - Deletion of Rhodamine B
GRAND Plus Insecticide and Fungicide Cereal Seed Treatment
EPA Registration No. 2935-472 (formerly 8203-35)
Your Letter Dated June 27, 1989

Your basic Confidential Statement of Formulas (CSFs) referred above for the subject product are acceptable for the removal of Rhodamine B and the manufacturing location change. The total weight does not add up to 1200 kg in the basic formulation, you should change the amount of paraffinic oil in block 13.a from "27.31L" to "27.73L". A copy of each have been inserted into the record for the subject product.

However, based on the CSF dated June 23, 1989 for the alternate formulation, your product will not meet the label claim for Lindane using source product supplied by EPA Registration No. 2117-3 and EPA Registration No. 4083-1. The source products for Lindane are 99.5% active ingredient. Therefore, the percentage of Lindane in the product based on pure active form would be: $(18.77\%)(99.5\%) = 18.68\%$. Since this percentage is lower than the lower certified limit of 18.75%, you should revise your CSF so that the lower certified limit will be in agreement with the label claim. Note: The source product for Lindane in the basic formulation is EPA Registration No. 264-455 (Rheno-Pouleno AG Co.) and the source product for Maneb EPA Registration No. 4581-355 contains 86% Maneb.

At the next label revision, you should remove the following footnote found under the label ingredient statement: "This product contains the toxic inert Rhodamine B."

Sincerely yours,


George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (77805C)

GRANOL^R Plus

INSECTICIDE AND FUNGICIDE CEREAL SEED TREATMENT

Contains MERTECT^RACCEPTED
with COMMENTS
in EPA Letter Dated:

FOR AGRICULTURAL USE ONLY

JAN 28 1988

WHEAT

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
8203-35

ACTIVE INGREDIENTS	%
Maneb (Manganese ethylenebisdithiocarbamate)	25.00
Thiabendazole (2-(4-thiazolyl) benzimidazole)	1.00
Lindane (Gamma isomer of benzene hexachloride)	18.75
INERT INGREDIENTS	<u>55.25</u>
TOTAL	100.00

This product contains the toxic inert rhodamine B

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautionary information.

EPA Est 8203-CN-1

EPA Reg. No. 8203-

GRANOL is a registered trademark of C-I-L Inc., Canada

MERTECT is a registered trademark of Merck & Co., Inc.

PRECAUTIONARY STATEMENTS

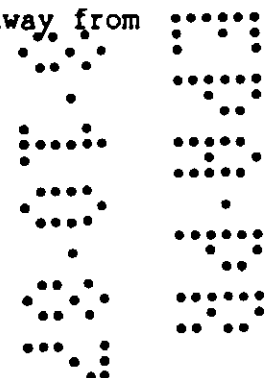
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Harmful if inhaled. Causes eye irritation. Avoid contact with skin, eyes and clothing. Avoid breathing dust. Protective clothing (long pants, long sleeve shirt, gloves, hat, boots and a disposable, paper dust mask which covers at least one-third of the face) must be worn during mixing and loading. Avoid contact with eyes by wearing safety goggles while treating seed. Treat outdoors or treat in a well ventilated place. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of feed, food and foodstuffs. Do not graze or cut green forage for livestock feed from fields planted with treated seed.

STATEMENT OF PRACTICAL TREATMENT: If **swallowed**, call a physician and/or the Poison Control Centre immediately. Drink one or two large glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person. If **on skin**, wash with plenty of soap and water. If in **eyes**, flush with plenty of water. Get medical attention. If **inhaled**, remove victim to fresh air. Get medical attention.

ENVIRONMENTAL HAZARDS: Product is toxic to fish, birds and other wildlife. Do not apply directly to water. Exposed treated seed may be hazardous to birds and other wildlife. Dispose of all excess treated seeds by burial away from bodies of water.

In case of significant spill, call CHEMTREC 1-(800) 424-9300.



PRODUCT INFORMATION: GRANOL Plus is a special seed treatment formulation of maneb, and thiabendazole fungicides, and lindane which, when used at the correct dosage rate, protects wheat against the seed-borne disease Stinking Smut (Bunt). It also protects wheat against certain seed and soil-borne diseases such as Root Rot and Seedling Blight during germination and the early seedling stage; and gives temporary protection of seeds and seedlings against wireworms.

GRANOL Plus is especially designed for on-the-farm treatment for drill or planter box application. It is to be mixed directly with the seed in the box, either as it is run into the box, or by spreading the treatment in a layer over the leveled seed and thoroughly mixing the treatment into the seed with an axe handle (purchased and used for this purpose only.)

PHYSICAL AND CHEMICAL HAZARDS: If maneb becomes wet in storage, its fungicidal effectiveness may be reduced and it may also produce vapors which may be flammable. Keep away from flames or sparks.

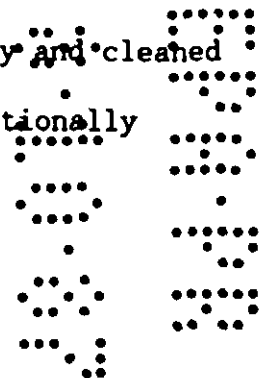
DIRECTIONS FOR USE

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

Wheat -

Use 2 oz. per Bushel

Use only recommended rates - lower amounts may not give the desired control. Higher amounts may cause seed injury. Seed should be well cured, dry and cleaned before treatment. For maximum benefits avoid deep seeding and exceptionally early sowing under poor growing conditions.



1. Mix GRANOL Plus thoroughly into the seed until the powder uniformly coats the seed. Use an automatic seed treater that meters the proper amount of GRANOL Plus and uniformly mixes it as seed is augered from the grain box into the planter or drill box.
2. Place and level one-half of the seed in the drill or planter box, sprinkle one-half of the total GRANOL Plus required for the full planter box uniformly over the seed. Mix thoroughly with an axe handle (purchased and used for this purpose only), then fill the box with seed and sprinkle the remaining one-half of the powder over the seed and again mix until the seed is uniformly coated.
3. Dribble required amount of GRANOL Plus into each bushel of cereal seed as it is poured into the drill box, and mix until seed is uniformly coated.

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 in a dry, ventilated place away from food and feed. Do not allow to become wet in storage.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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 and tap side and bottom to loosen clinging particles. Empty into application equipment. Then 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.

NOTICE TO BUYER: Seller's guarantee shall be limited to the terms set out on the label and subject thereto, the buyer assumes the risk to persons or property arising from the use or handling of this product and accepts the product on that condition.

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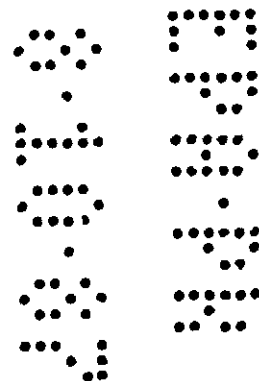
Chipman

A Business Unit of C-I-L Inc.

Stoney Creek, Ontario

L8G 3Z1

CONTAINER AND CONTENTS MADE IN CANADA



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