

DEC 06 1994

Ms. Joanne Striebich  
Wilbur-Ellis Company  
191 W. Shaw Ave., Suite 107  
Fresno, CA 93704

Dear Ms. Striebich:

Subject: AGROSOL Systemic Soybean Seed Treatment Fungicide  
EPA Registration No. 2935-475  
Applications Dated September 26, 1994, Request  
Alternate Formula To Include Rhodamine B As  
Colorant To Formulation and November 17, 1994,  
Responding to Agency Letter Dated October 14, 1994,  
and Your Letter Dated November 17, 1994

The proposed alternate formulation for the subject pesticide product submitted on EPA Form 8570-4 and dated June 28, 1994 has been reviewed and found acceptable for registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended. The Alternate Confidential Statement of Formula has been added to the record for this pesticide product registration.

The proposed labeling bearing the statement "This product contains the toxic inert ingredient Rhodamine B" below the ingredient statement has been reviewed and is acceptable for registration under FIFRA as amended provided that:

1. The Rhodamine B Consortium submits adequate data to support the use of Rhodamine B as the dye (colorant) to identify the seeds that have been treated with this product, and that you continue to support the Consortium in this effort and that an acceptable risk of hazard is supported by the data submitted in a timely manner by the Consortium.
2. Submit one (1) copy of the final printed label before releasing the product for shipment.

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

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

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

Enclosure

E.wilson:Diskette#0009:12-02-94

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## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes. Avoid contact with skin and clothing. Avoid contamination of feed, food and foodstuffs. Do not graze or cut soybean forage for feed.

### 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.

### ENGINEERING CONTROLS STATEMENT

When handlers use closed systems, enclosed cabs, or enclosures in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d), (4)-(5)], the handler PPE requirements may be reduced or modified as specified in the WPS.

### 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.

### 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.

### PRODUCT INFORMATION

AGROSOL, when used at the correct use rate, protects seeds from soil and seed-borne diseases. The systemic action of the thiabendazole present in AGROSOL will suppress pod and stem blight (Phomopsis spp.) of soybeans during germination and early seedling stages. AGROSOL also provides essential molybdenum for plant growth where soils are found to be deficient in available molybdenum.

### DIRECTIONS FOR USE

This 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 ALL APPLICABLE STATE AND FEDERAL REGULATIONS.

Do not apply this product in a way that will contact workers and other persons, either directly or through drift. Only certified applicators may treat the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### 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.

**EXCEPTION:** For the last 48 hours of the REI, workers may enter the treated area to perform hard labor or other tasks involving anything that has been treated, such as plants, soil, or water, without time limit, if they wear the fully-protective 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: 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.

### APPLICATION INSTRUCTIONS

AGROSOL may be applied at a planter box application or by the use of any suitable dry treating equipment, including planter equipment, apply AGROSOL to seed and mix thoroughly with the seed in the planter box or drill at the following use rates:

Soybeans: 1/2 oz. per bushel (one scoop per bushel)

#### SUGGESTED MIXING INSTRUCTIONS:

- Planter:**
1. Pour one bushel of seed into a clean planter box.
  2. Put one scoop of AGROSOL on top of seed in a planter box.
  3. Mix thoroughly with an iron handle or paddle (an iron handle or paddle used for seed treating purposes only) that has been cleaned and is not oiled.
- Drill:**
1. Fill drill one full fill keeping track of the number of fill (scoops) you poured into the drill.
  2. Put one scoop of AGROSOL on top of seed in the drill.
  3. Mix thoroughly with an iron handle or paddle (an iron handle or paddle used for seed treating purposes only) that has been cleaned and is not oiled.
  4. Fill the remainder of the drill with seed.

Always apply AGROSOL to seed before planting. Do not apply to soil or other non-targeted areas.

## Systemic Hopper Box Seed Treatment Fungicide with Molybdenum

Contains Thiabendazole  
For Use on Soybeans

This Product Contains 9.5% Molybdenum  
from Sodium Molybdate

#### ACTIVE INGREDIENTS

*Captan	By Wt.	24.44%
*Related derivatives		0.56%
*Thiabendazole		0.68%

#### INERT INGREDIENTS

*N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide	TOTAL:	100.00%
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\*\*2-(4-Thiazolyl) benzimidazole

EPA Reg. No. 2935-476

EPA Est. No. 70-KY-1

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## 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.)

### 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. Call a physician.

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

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

See side panel for additional precautionary statements.

### MEASURING SCOOP ENCLOSED

### APPLICATION INSTRUCTIONS (cont.)

**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. Over application could cause build-up in planter or drill. 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 needed, clean out the electric eye monitors with brushes provided by the planter manufacturer, according to their directions. Under extremely humid weather conditions, the clean-up process may need to be done more often.

Avoid contamination of food or animal feed.

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

Treated seed must not be used for human consumption nor for animal feed. Excess treated seeds must be buried underground away from any body of water or destroyed in accordance with state and local authorities.

### STORAGE AND DISPOSAL

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

**STORAGE:** Keep container tightly closed when not in use. Do not use or store near animal 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:** Completely empty container and tap sides and bottom to loosen clinging particles. Empty residue 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 - 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 purposes of curative control of existing diseases 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 IDEA TO GROW WITH are trademarks of WILBUR-ELLIS COMPANY.

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

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

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THIS PRODUCT CONTAINS THE TOXIC INERT RHODAMINE B

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated

DEC 06 1994

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

2935-476