

DEC 26 1991

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

) Dear Ms. Pratt:

Subject: Label Revisions - Safe Handling
Agrosol Pour-On Systemic Soybean Seed Treatment
Fungicide
EPA Registration No. 2935-477
Your Submission Dated August 22, 1991

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

) a. In the ingredient statement move thiabendazole before the chemical name.

b. The additional precautionary statements must be moved to the Precautionary Statement's Section on page 2 of the label. Duplicate statements should be deleted. The first statement in this section must include the statement "Harmful if absorbed through skin".

c. In the Statements of Practical Treatment include the following:

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

If in eyes: Flush with plenty of water. Call a physician if irritation persists.

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2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

Precautionary Review Section / Registration Support Branch could only locate certain acute toxicity studies applicable to this product. The acute inhalation and dermal sensitization toxicity studies required by Title 40 Code of Federal Regulations (CFR) Part 158 for this end-use product will have to be submitted or cited at reregistration or when the Agency may require them. Further label revisions may be required following the submission of these studies.

Sincerely yours,

Cynthia Giles-Parker

Cynthia Giles-Parker
Product Manager (22)
Fungicide Herbicide Branch
Registration Division (H7505C)

Enclosure

AGROSOL™* POUR-ON
SYSTEMIC SOYBEAN SEED TREATMENT FUNGICIDE

CONTAINS MERTECT(R)**

THIS PRODUCT CONTAINS 4.14% MOLYBDENUM FROM SODIUM MOLYBDATE

ACTIVE INGREDIENTS:	BY WT.
THIRAM (TETRAMETHYL THIURAM DISULFIDE)	11.400%
2-(4-THIAZOLYL) BENDIMIDAZOLE (THIABENDAZOLE)	0.314%
INERT INGREDIENTS:	88.268%
TOTAL	100.000%

THIS PRODUCT CONTAINS 1.09 LB. THIRAM PER GALLON.
0.03 LB. THIABENDAZOLE PER GALLON

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY INFORMATION

EPA REG. NO. 2935-477
EPA EST. NO. 37429-GA-1
NET CONTENTS: 32 FL. OZ.

*AGROSOL IS A TRADEMARK OF C-I-L INC., CANADA
**MERTECT IS A REGISTERED TRADEMARK OF MERCK & CO., INC.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

SEP 26 1981

Handwritten notes and stamps, including "2935-477" and "2935-477" in a box.

2935-477

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION:

CAUSES SKIN AND EYE IRRITATION. HARMFUL IF SWALLOWED, INHALED OR ABSORBED THROUGH SKIN. DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING. WEAR GOGGLES OR FACE SHIELD AND RUBBER GLOVES WHEN HANDLING. AVOID INHALING DUST. DO NOT STORE NEAR FOOD AND FEED. DURING COMMERCIAL EXPOSURE IN SEED TREATMENT AND LOADING OPERATIONS, WEAR GOGGLES, CLEAN RUBBER GLOVES, PROTECTIVE CLOTHING, AND 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 II. WASH HANDS, ARMS AND FACE THOROUGHLY WITH SOAP AND WATER AFTER HANDLING AND BEFORE EATING AND SMOKING. ROUTINELY SHOWER OR BATHE AFTER WORK. WASH ALL CLOTHING WITH SOAP AND HOT WATER BEFORE REUSING. DO NOT USE OR STORE NEAR FOOD OR FEED. CONSUMPTION OF ALCOHOLIC BEVERAGES INCREASES THE TOXIC EFFECTS OF THIRAM.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED, INDUCE VOMITING BY DRINKING 1 OR 2 LARGE GLASSES OF WATER AND THEN TOUCH BACK OF THROAT WITH FINGER. GET MEDICAL ATTENTION. IF IN EYES, FLUSH WITH CLEAN WATER FOR AT LEAST 15 MINUTES AND THEN GET MEDICAL ATTENTION. IF ON SKIN, WASH WITH SOAP AND WATER. GET MEDICAL ATTENTION IF SKIN IRRITATION PERSISTS.

ENVIRONMENTAL HAZARDS

THIS PRODUCT IS TOXIC TO FISH. DO NOT CONTAMINATE WATER WHEN DISPOSING OF EQUIPMENT WASH WATERS. DO NOT CONTAMINATE ANY BODY OF WATER BY CLEANING OF EQUIPMENT AND DISPOSAL OF WASTES AND CONTAINERS. EXPOSED TREATED SEEDS MAY BE HAZARDOUS TO BIRDS AND OTHER WILDLIFE. DISPOSE OF ALL EXCESS TREATED SEED BY BURIAL AWAY FROM BODIES OF WATER.

PRODUCT INFORMATION

AGROSOL POUR-ON WHEN USED AT THE CORRECT RATE PROTECTS SEEDS FROM SOIL AND SEED BORNE DISEASES THAT CAUSE DAMPING-OFF, SEED DECAY, SEEDLING BLIGHTS, AND POD AND STEM BLIGHT (PHOMOPSIS SPP) DURING GERMINATION AND EARLY SEEDLING STAGES. AGROSOL POUR-ON PROVIDES ESSENTIAL MOLYBDENUM FOR PLANT GROWTH WHERE SOILS ARE FOUND TO BE DEFICIENT IN AVAILABLE MOLYBDENUM.

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 ALL APPLICABLE STATE AND FEDERAL REGULATIONS.

SHAKE OR STIR WELL BEFORE USING.

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APPLY AGROSOL POUR-ON AS A PLANTER BOX OR DRILL TREATMENT AT THE FOLLOWING RATE:

SOYBEANS: 4 FLUID OUNCES PER BUSHEL (6.6 FLUID OUNCES PER 100 LBS OF SEED).

MIX THOROUGHLY WITH SEED IN THE PLANTER BOX OR DRILL AS FOLLOWS:

PLANTER: 1. POUR ONE BUSHEL OF SEED INTO EACH PLANTER BOX.
2. POUR ENOUGH AGROSOL POUR-ON ON TOP OF THE SEED TO TREAT ONE BUSHEL.
3. MIX THOROUGHLY WITH AN AXE HANDLE OR PADDLE (AN AXE HANDLE OR PADDLE USED FOR SEED TREATMENT PURPOSES ONLY) UNTIL ALL SEEDS ARE UNIFORMLY COATED.

DRILL: 1. FILL DRILL ONE-HALF FULL, KEEPING TRACK OF THE NUMBER OF BAGS (BUSHELS) POURED IN.
2. POUR 4 FLUID OUNCES OF AGROSOL POUR-ON ON TOP OF EACH BUSHEL OF SEED JUST PUT INTO DRILL.
3. MIX THOROUGHLY WITH AN AXE HANDLE OR PADDLE (AN AXE HANDLE OR PADDLE USED FOR SEED TREATMENT PURPOSES ONLY) UNTIL ALL SEEDS ARE UNIFORMLY COATED.
4. FILL THE REMAINDER OF THE DRILL AND REPEAT THE PROCESS IN ITEMS 2 AND 3.

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.

CLEAN-UP FOR ELECTRIC EYE POPULATION MONITORS: AT THE END OF EACH DAY OF USE, CLEAN OUT THE ELECTRIC-EYE MONITORS WITH BRUSHES PROVIDED BY THE PLANTER MANUFACTURERS, ACCORDING TO THEIR DIRECTIONS.

COMMERCIAL TREATMENT: USE AT TEMPERATURES ABOVE 40 F. USE AGROSOL POUR-ON IN LIQUID AND SLURRY TREATERS AT A RATE OF 4 FL. OZ. PER BUSHEL OF SOYBEAN SEED (6.6 FL. OZ. PER 100 LBS. OF SOYBEAN SEED).

NOTE: THE PURCHASER OF THIS PRODUCT IS RESPONSIBLE FOR ENSURING 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.

SEED COMMERCIALY TREATED WITH THIS PRODUCT MUST BE LABELLED WITH THE FOLLOWING INFORMATION:

THIS SEED HAS BEEN TREATED WITH THIRAM AND THIABENDAZOLE.
DO NOT USE TREATED SEED FOR FOOD, FEED, OR OIL PURPOSES.
STORE AWAY FROM FEED AND FOODSTUFFS.

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.

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.

DO NOT CONSUME ALCOHOLIC BEVERAGES IMMEDIATELY BEFORE OR WITHIN 24 HOURS AFTER WORKING WITH AGROSOL POUR-ON.

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7 AFTER EACH DAY OF 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.

IN THE EVENT TREATED SEEDS ARE SPILLED AND CANNOT BE SALVAGED, COMPLETELY COVER WITH SOIL.

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. KEEP CONTAINER TIGHTLY CLOSED WHEN NOT IN USE. STORE AWAY FROM WATER, FOOD AND FEED.

PESTICIDE DISPOSAL: PESTICIDE WASTES ARE TOXIC. IMPROPER DISPOSAL OF EXCESS PESTICIDE, SPRAY MIXTURE, OR RINSE 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, THEN PUNCTURE AND DISPOSE OF CONTAINER IN A SANITARY LANDFILL OR, IF ALLOWED BY STATE AND LOCAL AUTHORITIES, BY BURNING. IF BURNED, STAY OUT OF SMOKE.

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, 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 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.

WILBUR-ELLIS COMPANY
P. O. BOX 16458
FRESNO, CA 93755

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