UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

March 21, 2001

Mr. Dennis McFadden Gustafson LLC 1400 Preston Road, Suite 400 Dallas, TX 75093

Subject: Reldan 4E

EPA Reg. No. 7501-41

Submission dated Jan 26, 2001

Dear Mr. McFadden:

The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is acceptable provided that you make the labeling changes indicated before you release the product for shipment bearing the amended labeling:

1) Insert the following under the heading "Directions for Use" right after the sentence "Only protected handlers may be in the area.", SRRD has requested that you state:

> "Empty grain bin treatment applications are only permitted outside of the bin. Only downward spray is permitted. All openings, except for the point of application, must be closed during application. This product may only be applied to empty grain bins using high-pressure hand held or automated spray equipment."

Submit one copy of the revised final printed label before releasing the product for shipment. A stamped copy of the label is enclosed for your records. If you have questions, please contact Dennis McNeilly at (703) 308-6742 or electronically at moneilly dennis@epa.gov.

Sincerely,

Dennis McNeilly, Chemist

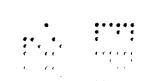
Insecticide-Rodenticide Branch Registration Division (7505C)

ACCEPTED with COMMENTS In EPA Letter Dated: MAR 2 1 2001

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

Gustafson Reldan® 4E

Insecticide



ACTIVE INGREDIENTS:

Chlorpyrifos-methyl (0,0-dimethyl 0-(3,5,6-

Contains 4 lb. chlorpyrifos-methyl per gallon

KEEP OUT OF REACH OF CHILDREN DANGER

See Additional Precautionary Statements.

EPA Reg. No. 7501-41

EPA Est.

U.S Patent No. 3,244,586

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive, causes eye and skin damage or irritation. Do not get in eyes, on skin or on clothing. Do not breathe vapors and spray mist. Keep container closed. Keep away from food, feedstuffs and water supplies.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

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.

Mixers, Loaders, Applicators and other handlers must wear: long-sleeved shirt and long pants, chemical resisitant gloves, such as barrier laminate, butyl rubber, nitrile rubber, or Viton. In addition, applicators applying to empty grain bins must wear: A NIOSH-approved dust/mist filtering respirator with MSHA/NIOSH approval number TC-21C or a NIOSH-approved respirator with any N, R, P, or HE filter. See Engineering Controls for additional requirements: 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:

Handlers applying directly to grain or stored seed must use automated admixture system. The system must apply the pesticide directly to the grain or seed and transfer grain or seed directly into stationary storage facilities.

USER SAFETY RECOMMENDATION:

Users and persons in the treated area should avoid inhalation of treated grain dust. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of the gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor for treatment advice. If in eyes:

- -Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice. If swallowed:
- Immediately call a poison control center or doctor.
- -Do not induce vomiting unless told to do so by a poison control center or doctor.
- -Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person. If on skin or clothing:
- Take off contaminated clothing.
- -Rinse skin immediately with plenty of water for 15 20 minutes.
- -Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Contains petroleum distillate - vomiting may cause aspiration pneumonia. Contains an organophosphate that inhibits cholinesterase. Treat symptomatically. Atropine by injection is the preferable antidote. Oximes such as 2-PAM may or may not be therapeutic, but it is recommended they not be used in place of atropine.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment for disposal of wastes. Do not discharge directly or indirectly to surface water. Do not discharge effluent containing this product to sewrer systems without previously notifying the local sewage treatment plant authority.

Gustafson 🚷



PHYSICAL OR CHEMICAL HAZARDS

Combustible - Do Not Use or Store Near Heat or Open Flame. Do Not Cut or Weld Container.

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.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by State and Local authorities.

PRODUCT STORAGE: Store in a cool, dry location. Do not store in direct sunlight.

PRODUCTINFORMATION:

STORED GRAIN: For protection of stored food, feed, and oil grains against injury from stored grain weevils, moths, beetles and mealworms including granary weevil, rice weevil, red flour beetle, confused flour beetle, saw-toothed grain beetle, Indianmeal moth, and Angoumois grain moth. For optimum results, thoroughly clean and treat grain storage areas prior to storage of grain. If grain is insect infested, fumigate* to control existing populations and apply RELDAN for residual protection.

SEED TREATMENT: For protection of stored seed against injury from stored grain insects listed above. For optimum results, thoroughly clean and treat seed storage areas prior to storage of seed. If seed is insect infested, fumigate* to control existing populations and apply RELDAN for residual protection.

GRAIN BIN AND WAREHOUSE: Empty grain bin treatment applications are only permitted from outside of the bin. Only downward spray is permitted. All openings, except for the point of application, must be closed during applications. This product may only be applied to empty grain bins using automated spray equipment. Do not enter or allow others to enter until sprays have dried.

Dilute Gustafson RELDAN 4E with water to give a final concentration of 1% chlorpyrifos-methyl (1/2 pint of product per 3 gallons of finished spray or 1/2 liter of product per 25 liters of finished spray). Apply finished spray to equipment, wall and floor surfaces at the rate of 1 gallon per 650 to 1250 sq. ft. (946 ml per 60 to 115 square meters) prior to storing or handling grain. Application should be made only after equipment bins and buildings have been thoroughly cleaned and are insect free. Empty bin fumigation* is appropriate when inaccessible areas exist.

GENERAL DIRECTIONS FOR TREATMENT OF GRAIN BEING STORED: Dilute Gustafson RELDAN 4E with water or FDA approved food grade mineral or soybean oils and apply to the moving grain stream as a coarse spray to give a deposit of 6 ppm of chlorpyrifos-methyl on the grain. Final spray volume with water solutions of 5 gallons of liquid per 1000 bu. of grain. Final spray volume with oil solutions should be applied at oil manufacturers' rates. Occasional agitation is needed in water solutions and constant agitation is necessary in oil solutions.

Gustafson RELDAN 4E is to be applied in solution in accordance with the General Directions to stored grains at the following rate per 1000 bu. to provide treatment with 6 ppm concentrations of chlorpyrifos-methyl:

	<u>6 ppm</u>	
	fl. oz.	ml.
Barley	9.2	270
Oats	6.2	180
Rice	8.6	255
Sorghum (milo)	10.7	315
Wheat	11.5	340

Gustafson RELDAN 4E is to be applied in solution in accordance with the General Directions to stored grains at the rate of 67.7 liters of solution per 100 metric tons to provide treatment with 6 ppm concentrations of chlorpyrifos-methyl:

6	ppm
fl. oz.	m!
41.7	1250

* Fumigate with Phosphine or Methyl Bromide according to manufacturer's label recommendations.

USEPRECAUTIONS:

- Avoid contact with treated grain until liquid has dried.
- Avoid application at extremely dusty sites.
- Reldan solutions should be used within 48 hours.
- Check spray equipment calibration regularly to ensure proper application rates.
- When drying grain, apply Reldan after the grain has cooled.

NOTICE-READ CAREFULLY CONDITIONS OF SALE AND LIMITED WARRANTY STATEMENT

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, 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 Gustafson LLC no claims are made to guarantee germination of carry-over seed.

As its sole express warranty, Gustafson LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for purposes stated on the label only when used in accordance with directions and instructions specified on the label, subject to the inherent risks set forth above. ONLY AS PERMITTED BY APPLICABLE LAW, IN THE EVENT OF A BREACH OF THIS LIMITED WARRANTY, GUSTAFSON LLC SHALL NOT BE LIABLE FOR CONSEQUENTIAL DAMAGES. SUBJECT TO APPLICABLE LAW, GUSTAFSON LLC NEITHER MAKES NOR AUTHORIZES ANY OF ITS AGENTS OR REPRE-SENTATIVES TO MAKE ANY WARRANTY OF FITNESS OR MER-CHANTABILITY, GUARANTY OR REPRESENTATION, EX-PRESS OR IMPLIED, CONCERNING THIS MATERIAL. Buyer assumes the responsibility to handle, use and store this product in accordance with the safety instructions and use directions contained on the label.

Buyer/User purchases this product subject to the foregoing Conditions of Sale and Limited Warranty, which, subject to applicable law, may be varied only by a written agreement signed by a duly authorized representative of Gustafson LLC. If these terms are not acceptable, return all products to the place of purchase, unopened for a full refund.

A quality product manufactured by: Gustafson LLC
1400 Preston Road, Suite 400
Plano, Texas 75093
(972) 985-8877

Gustafson (logo) is a Reg. TM of Gustafson LLC RELDAN is a Reg. TM of Dow AgroSciences

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