

<u>189643</u>	<u>310</u>
5	18
<u>345</u>	<u>1</u>
17	

MAY 27 1987

Mr. J.C. Rockwell  
 Gustafson, Inc.  
 P.O. Box 660065  
 Dallas, TX 75266-0065

Dear Mr. Rockwell:

Subject: Amendments - Add Cotton Seed Treatment and Formula Change  
 Gustafson VITAVAX-PCNB Flowable Fungicide  
 EPA Registration No. 7501-87  
 Your Submissions Dated November 21, 1986 and  
 March 3, 1987

The amendments referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), are acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
  - a. Replace the existing paragraph under Use Restrictions with the following (or similar phraseology):

Since this product does not contain a dye, - all seed treated with this product (except by the hopper box method) must be colored with an EPA-approved dye (e.g., 40 CFR 180.1001) which imparts an unnatural color to the seed to help prevent the inadvertent use of treated seed as food for man or feed for animals.

(Note: Your proposed reference to 21 CFR 2.25 is not applicable since it only applies to "grain" seed.)

88949:I:Schnaubelt:J-4:KENCO:5/13/87:5/21/87:kim:lf:EK:dej:VO:dej

**CONCURRENCES**

SYMBOL	ORIGINATOR						
SURNAME							
DATE							

b. Revise the Environmental Hazards statement to read as follows:

This pesticide is toxic to fish and aquatic organisms. Cover or incorporate treated seeds. Do not contaminate water or wetlands by cleaning of equipment or disposal of wastes.

c. Under Use Restrictions, change "Do not use treated seed for food or feed purposes" to "Do not use treated seed for food, feed, or oil purposes."

d. Add the following restriction to the cotton directions:

Do not graze or feed livestock on hay grown from treated seed.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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 bearing the amended labeling constitutes acceptance of these conditions.

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

We are also accepting your Confidential Statement of Formula dated March 3, 1987. It is understood that this basic formulation change supersedes all previously accepted basic and alternate formulations for this product.

Sincerely yours,

Lois A. Rossi  
Acting Product Manager (21)  
Fungicide-Herbicide Branch  
Registration Division (TS-767C)

Enclosure

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**CAUTION**

Harmful if swallowed, inhaled or absorbed through the skin. May cause irritation of nose, throat, eyes and skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapors or spray mist. Protective clothing (long pants, long-sleeved shirts, gloves, hat and boots) must be worn during mixing and loading.

Wash hands and face thoroughly with soap and water after use or before eating or smoking. Remove and wash contaminated clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

**DIRECTIONS FOR USE**

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

**STORAGE AND DISPOSAL**

**PROHIBITIONS:** Do not contaminate water, food or feed by storage or disposal or by cleaning of equipment. Open dumping is prohibited.

**STORAGE:** Store in a cool, dry location. Do not store in direct hot sunlight. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or resinate 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) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state or local authorities.

**Gustafson**   
**VITAVAX® -PCNB**  
FLOWABLE FUNGICIDE

**ACTIVE INGREDIENTS:**

Carboxin (5,6-dihydro-2-methyl-1,4-oxathiin-3-carboxanilide)\* ..... 17%  
Pentachloronitrobenzene ..... 17%

**INERT INGREDIENTS:** ..... 66%  
..... 100%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Induce vomiting and see a physician.  
**IF INHALED:** See a physician if an abnormal reaction occurs.  
**IF ON SKIN:** Wash thoroughly with soap and water.  
**IF IN EYES:** Immediately flush eyes with plenty of water. See a physician if irritation develops.

See left side panel for additional precautionary statement.

U.S. Patent Nos. 3,249,499 - 3,393,202 - 3,454,391  
Contains 1.68 lbs. carboxin and 1.68 lbs. PCNB per U.S. gallon.  
EPA Est. No. 7501-ID-1  
EPA Reg. No. 7501-87  
NET CONTENTS: 5 gallons

Gustafson  is a Reg. TM of Gustafson, Inc.  
\*VITAVAX is a Reg. TM of UNIROYAL CHEMICAL, Division of Uniroyal, Inc.

**DIRECTIONS FOR USE**

Gustafson Vitavax-PCNB Flowable Fungicide is a ready-to-use seed treatment.

Gustafson Vitavax-PCNB Flowable Fungicide combines the systemic action of carboxin with the surface action of PCNB to control various seed and seedling diseases. It is particularly effective against *Rhizoctonia solani*.

**BARLEY, WHEAT AND OATS**

Use 3-4 fluid ounces of Gustafson Vitavax-PCNB Flowable Fungicide per 100 pounds of seed. Gustafson Vitavax-PCNB Flowable Fungicide should be applied as a slurry treatment by machine. Use the higher rate under conditions of expected heavy disease pressure.

In addition, loose smut (*Ustilago nuda*) and covered smut (*Ustilago hordei*) are controlled on barley, and loose smut (*Ustilago tritici*) and common bunt (*Tilletia caries*) are controlled on wheat by Gustafson Vitavax-PCNB Flowable Fungicide.

**SOYBEANS**

Use 2 fluid ounces of Gustafson Vitavax-PCNB Flowable Fungicide per bushel of seed or 4 fluid ounces per 100 pounds of seed. Gustafson Vitavax-PCNB Flowable Fungicide should be applied as a slurry treatment by machine.

**USE RESTRICTIONS**

Do not use treated seed for food or feed purposes. Do not graze or feed livestock on treated areas for six weeks after planting. Care must be exercised in the handling of treated seed.

**COMPATIBILITY**

Gustafson Vitavax-PCNB Flowable Fungicide should not be tank mixed with any pesticide unless adequate physical and compatibility and phytotoxicity tests have been completed and proved to be satisfactory.

**SEED LABELING** — "This seed treated with Gustafson Vitavax-PCNB Flowable Fungicide. Do not use treated seed for food, feed or oil purposes." Add appropriate information for any other chemical treatment.

**NOTICE — READ CAREFULLY  
LIMITED WARRANTY STATEMENT**

Gustafson 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. Gustafson neither makes, nor authorizes any agent or representative to make any other warranty of FITNESS or MERCHANTABILITY, guarantee or representation, expressed or implied, concerning this material. In the event of any breach by Gustafson of this limited warranty, Gustafson shall not be liable for consequential damages.

A quality product manufactured by: Gustafson  17400 Dallas North Parkway, Suite 220 — Dallas, Texas 75252-4493 (214) 931-8899

L115 — 8/85

In EPA Letter Dated:

**MAY 27 1987**

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

**7501-87**

3/4

Date of Draft: 3/3/87

Gustafson  
VITAVAX-PCNB  
Flowable Fungicide  
EPA Reg. No. 7501-87

Amendment to Existing Labeling

Add The Following (Directions for Use):

Cotton

Use 5 to 7 fluid ounces of Gustafson VITAVAX-PCNB Flowable Fungicide per 100 pounds of seed as a slurry treatment by machine. Use the higher rate under conditions of expected heavy disease pressure.

Add The Following (Use Restrictions):

This product does not contain dye. The purchaser of this product is responsible for insuring that all seed treated are adequately dyed with a suitable color to prevent its accidental use as a food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye added to treated seed must be cleared for use under 40 CFR, Part 180.1001.

**ACCEPTED**  
**WITH COMMENTS**  
EPA Letter Dated:

**MAY 27 1987**

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

7501-87

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....