

28 AUG 1995

Mr. D.L. McFadden
Gustafson, Inc.
P.O. Box 660065
Dallas, TX 75266-0065

Dear Mr. McFadden:

Subject: Use on Sugarbeets and Wheat
Gaucho 480 Flowable
EPA Reg. No. 7501-155
Application Dated February 7, 1994

The Agency is conditionally approving an amendment to the registration of the above referenced product under the authority of Section 3(c)(7)(B) of the Federal Insecticide, Fungicide and Rodenticide Act, (FIFRA), as amended. This amendment allows a 2-year time limited registration on wheat and sugarbeets, to expire automatically on September 1, 1997. In addition, during the period that this amendment is effective, it will be subject to the conditions listed below. To maintain your registration you must:

1. Submit a minimum of 4 wheat field trials (although 5 preferred) from Region 7.

2. Submit a minimum of 3 wheat field trials (although 5 preferred) from Region 8.

The wheat field trial data must be submitted by February 15, 1997. You are reminded to plant wheat seed treated with 3 fl ozs of Gaucho 480 F per 100 lbs of wheat seed; ie, the 1x application rate for the 7-10 additional wheat field trials. Total imidacloprid residue data should be presented from these field trials for wheat grain, forage, straw, hay and aspirated grain fractions.

3. Submit additional sugarbeet field trials 1 each from Regions 5, 9, 10 and 11.

The sugarbeet field trial data must be submitted by February 15, 1997. You are reminded to plant sugarbeet seeds treated with 6.3 fl ozs of Gaucho 480 F as a thin film coat to 1 kg of raw seed, or to the seed pelleted 2:1 (2 kg pelleted mixture:1 kg sugarbeet

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seed); ie, the 1x application rate for the 4 additional sugarbeet crop field trials.

4. Submit 2 copies of your final printed labeling before you release the product for shipment.

You should note that if you fail to satisfy any of the conditions imposed on this registration, e.g. you fail to submit the required data by the specified deadlines or the data submitted were not generated in accordance with the application test guidelines, EPA may issue a Notice to cancel this amendment under section 6(e) of FIFRA.

You should also note that, regardless of whether you satisfy all application conditions, this conditional registration will expire automatically on September 1, 1997. Sales and distribution of the subject product bearing labeling for use on wheat and sugarbeets after September 1, 1997 will be illegal. The tolerance authorizing residues of the subject product in /on wheat and sugarbeets will expire automatically on August 24, 1998. After that date, sales or distribution of food in interstate commerce containing any residue of the subject product will be in violation of the Federal Food, Drug and Cosmetic Act.

The Agency will not renew, extend or establish a new tolerance nor issue a condition conditional registration for wheat or sugarbeets until the additional field residue data have been submitted, reviewed and found acceptable.

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

Sincerely YOURS,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide & Rodenticide Branch
Registration Division (7505C)

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

GAUCHO™ 480

FLOWABLE

ACTIVE INGREDIENT:

1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro

-2-imidazolidinimine.....40.7%

INERT INGREDIENTS:.....59.3%

Total.....100.0%

Contains 4 lbs. active per gallon (480 grams per liter) @ 20°C.

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, absorbed through skin or inhaled. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician or Poison Control Center. Drink one or two glasses of water. Do not induce vomiting. Do not give anything by mouth to an unconscious person. **On Skin:** Wash with plenty of soap and water. Get medical attention if irritation develops. **If Inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention. **If Eyes:** Flush with plenty of water. Call a physician if irritation develops.

ENVIRONMENTAL HAZARDS

This product is highly toxic to birds and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spilled treated seeds.

EPA Reg No 7501-155

DIRECTIONS FOR USE

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

For use in commercial seed treaters only. Not for use on agricultural establishments in hopper-box, slurry-box, or other seed treatment applications at, or immediately before, planting. This product is to be used in liquid or slurry treaters. Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

STORAGE AND DISPOSAL

STORAGE: Store in a cool place. Do not store in direct sunlight. Protect from freezing temperatures.

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

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 incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Early Season Protection Against Certain Sucking Insects: GAUCHO 480 Flowable will aid in the protection of seeds and seedlings against injury by early season aphids, chinch bugs and thrips.

Wheat:

To provide early season protection of seedlings against injury by Aphids (including Bird cherry-oat, English grain, Greenbug, and Russian wheat aphid), Hessian fly and Wireworms, apply 1.0 to 3.0 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. Ensure thorough coverage. Use the higher rate to provide increased length of protection and from heavy insect pressure and from wireworms, and to reduce potential spread of Barley yellow dwarf virus due to aphid vectors. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum:

To provide early season protection of seedlings against injury by Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane aphid), Chinch bugs, Fire ants and Wireworms, apply 8 fluid ounces per hundred weight of seed prior to planting as a slurry treatment. Ensure thorough coverage. Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (Delinted Seed Only):

To provide early season protection of seedlings against injury by early season thrips and aphids, apply 8 fluid ounces per hundred weight of seed prior to planting as a slurry treatment so as to ensure thorough coverage.

Sugar Beets:

To provide early season protection of seedlings against injury by Whitefly, Aphids, Leafhoppers (including to reduce potential for spread of Curly top and Yellow mosaic virus due to aphid and leafhopper vectors), Root aphid, Thrips and Wireworms, apply as a commercial seed treatment at 2.0 to 6.3 fluid ounces of GAUCHO 480 Flowable in or on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed - approximately 1 kilogram by weight) or apply in a film coat directly to raw seed (100,000 seed or approximately 1 kilogram by weight).

ROTATIONAL CROPS:

Treated areas may be replanted with any crop specified on the GAUCHO label, or any crop for which a tolerance exists for the active ingredient.

For crops not listed on the GAUCHO label, or for crops for which no tolerances for the active ingredient have been established, a 12-month plant-back interval should be observed. Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.

NOTIFICATION of the crop rotational restriction must be con-

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veyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

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 21CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40CFR, Part 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at recommended rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with GAUCHO 480 Flowable must be labeled in accordance with all applicable requirements of the Federal Seed Act.

Labels for commercially treated seed should include the following addition to the Environmental Hazards statements:

Exposed treated seed may be hazardous to birds. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

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, Inc., no claims are made to guarantee germination of carry-over seed.

As its sole express warranty, Gustafson, Inc., 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, INC., SHALL NOT BE LIABLE FOR CONSEQUENTIAL DAMAGES. SUBJECT TO APPLICABLE LAW, GUSTAFSON, INC. NEITHER MAKES NOR AUTHORIZES ANY OF ITS AGENTS OR REPRESENTATIVES TO MAKE ANY WARRANTY OF FITNESS OR MERCHANTABILITY, GUARANTY OR REPRESENTATION, EXPRESS OR IMPLIED, CONCERNING THIS MATERIAL. Buyer assumes the responsibility to handle, use and store this product in accordance with 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, Inc. If these terms are not acceptable, return all products to the place of purchase, unopened for a full refund.

**IN CASE OF AN EMERGENCY ENDANGERING
LIFE OR PROPERTY INVOLVING THIS PRODUCT,
CALL (800) 424-9300**

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