

FEB 23 1995

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

Dear Mr. McFadden:

Subject: Conditional amendment for cotton
(delinted seed only)
Gaucho 75 St Insecticide
EPA Registration No. 7501-159
Amendment application of December 13, 1994

The Agency is conditionally approving an amendment to the registration of the above-reference product under the authority of section 3(c)(7)(a) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). This amendment allows a 1-year time limited registration on cotton, to expire automatically on December 7, 1995. 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 the three additional cotton field residue trials. There are insufficient geographical representation on cotton field trials. These trials must include seed treatment data. These data must be submitted by March 30, 1995.
2. Make the following label change:
Change the application rate on cotton to 4.75 fluid ounces per hundred
3. Submit five (5) 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.

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You should also note that, regardless of whether you satisfy all application conditions, this conditional registration will expire automatically on December 7, 1995. Sales and distribution of the subject product bearing labeling for use on cotton after December 7, 1995 will be illegal. The tolerance authorizing residues of the subject product in cotton will expire automatically, on November 17, 1996. 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 conditional registration for cotton until the additional cotton field residue data have been submitted, reviewed and found acceptable.

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

Sincerely yours,

DHS.

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

Enclosure

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GAUCHO™ 75 ST

INSECTICIDE

ACTIVE INGREDIENT:	
1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	75.0%
INERT INGREDIENTS:	25.0%
Total	100.0%

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 treaters designed for pelleting or coating seed. Mix thoroughly before use or use entire container at one time. All mixtures should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, absorbed through skin or inhaled. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or dust. 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 a unconscious person. On Skin: Wash immediately 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 In Eyes: Flush with plenty of water for 15 minutes. Get medical attention.

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.

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: Completely empty container into application equipment by tapping sides to dislodge residues. Then dispose of empty container in a sanitary landfill, 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 75 ST will aid in the protection of seeds and seedlings against injury by early season aphids, leafhoppers and thrips.

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 4.0 to 5.3 ounces per hundredweight of seed prior to planting. Ensure thorough coverage. Use the higher rate to provide increased protection from chinch bugs and wireworms. Do not graze or feed livestock on treated areas for 45 days after planting.

EPA File Symbol 7501-159 EPA Est. _____
Net Contents _____ Pounds

A quality product manufactured by:
Gustafson, Inc.
1400 Preston Road, Suite 400
Plano, Texas 75093

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Cotton (Deslinted Seed Only):

To provide early season protection of cotton thrips and aphids, apply 5.3 ounces prior to planting as a slurry treatment.

NOTE: The purchaser of this product must not use all seed treated with this product as a color to prevent its accidental use as a dye. Refer to 21CFR, Part 2.25. Any dye cleared for use under 40 CFR, Part 161. Federal regulations have established pesticide residues. In order that residues not exceed established tolerances, use must not overtreat GAUCHO 480 treated seed. Treated seed must not be used for or processed for oil. Seed commercial must be labeled in accordance with a Federal Seed Act.

Labels for commercially treated seed in addition to the Environmental Hazard

Exposed treated seed may be hazardous. Excess treated seed and seed packaging bodies of water. Cover or incorporate

ROTATIONAL CROPS: Treated areas may be replanted with GAUCHO label, or any crop for which the ingredient.

For crops not listed on the GAUCHO label, tolerances for the active ingredient have been established. A plant-back interval should be observed. Erosion control may be planted any time after food or feed. NOTIFICATION of the tolerance should be conveyed to the grower by appropriate means on all seed units.

NOTICE - READ CONDITIONS OF SALES WARRANTY STATEMENT

Treatment of highly mechanically damaged seed with vigor and poor quality, may result in reduction of seed and seedling vigor. Tests on a small portion of seed before a selected chemical treatment. Due to the control of Gustafson, Inc., no guarantee of germination of carry-over seed. As its sole express warranty, Gustafson, Inc. conforms to the chemical description for purposes stated on the label only.

CHO 75 ST

INSECTICIDE

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 treaters designed for pelleting or coating seed. Mix thoroughly before use or use entire container at one time. All mixtures 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: Completely empty container into application equipment by tapping sides to dislodge residues. Then dispose of empty container in a sanitary landfill 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 75 ST will aid in the protection of seeds and seedlings against injury by early season aphids, leafhoppers and thrips.

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 4.0 to 5.3 ounces per hundredweight of seed prior to planting. Ensure thorough coverage. Use the higher rate to provide increased protection from chinch bugs and wireworms. Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (Dyed Seed Only):

To provide early season protection of seedlings against injury by early season thrips and aphids, apply 5.3 ounces per hundredweight of seed prior to planting as a slurry treatment so as to ensure thorough coverage.

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 added to treated seed must be cleared for use under 40 CFR, 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. Do not over-treat GAUCHO 480 treated seed with GAUCHO 75 ST.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with GAUCHO 75 ST 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.

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

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, GUARANTEE OR REPRESENTATION, EXPRESS 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, 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

ACCEPTED
with COMMENTS
in EPA Letter 0001

FEB 23 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act, we warrant that this product conforms to the quality specifications

7501-159

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GAUCHO - trademark under license

G-ST(S)-598110

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