

7501-173

2-17-2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 17 2004

Mr. Dennis McFadden
Gustafson LLC
1400 Preston Rd., Suite 400
Plano, TX 75093

Subject: Addition of Carrot Seeds to Label
Gaucho 480 Flowable EPA Reg. No. 7501-155
Gaucho 600 Flowable EPA Reg. No. 7501-173
Your Submission date, October 31, 2003

Dear Mr. McFadden:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable. A stamped copy is enclosed for your records. Submit two (2) copies of your final printed labeling before you release the product for shipment. If there are questions call me at 703 305-5409.

Sincerely,

A handwritten signature, likely of Dani Daniel, is written in ink. It appears to be a stylized "D" followed by a surname.

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505C

Enclosure:

219

173(S)112403A7
(add carrots, list legumes)

GAUCHO[®] 600

FLOWABLE

ACTIVE INGREDIENTS:

Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine 48.7%

OTHER INGREDIENTS: 51.3%

TOTAL 100.0%

Contains 5 lbs. active per gallon (600 grams per liter) @ 20°C

EPA Reg. No. 7501- 173

EPA Est.

NET CONTENTS:

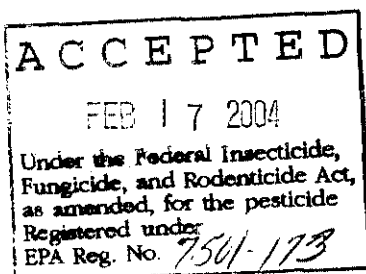
KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS

SEE ADDITIONAL PRECAUTIONARY STATEMENTS

A quality product manufactured by:



Gustafson 

Gustafson LLC
1400 Preston Rd., Suite 400
Plano, TX 75093
Questions? (972) 985-8877

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.

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 C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, socks and shoes and chemical-resistant gloves (such as nitrile, butyl, neoprene, barrier laminate, polyvinyl chloride or Viton). 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.

USER SAFETY RECOMMENDATIONS: Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing 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 gloves before removing. As soon as possible, wash thoroughly and change clothing.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • 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.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.

**IN CASE OF AN EMERGENCY ENDANGERING LIFE OR PROPERTY INVOLVING THIS
PRODUCT CALL:**

CHEMTREC: (800) 424-9300 (Toll free – US)

CHEMTREC: (703) 527-3887 (Domestic and International)

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.

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, with the exception of application to canola, cotton (delinted seed), field corn, sorghum, wheat and barley, which may be made either by commercial seed treatment or as an end-use seed treatment on agricultural establishments at, or immediately before, planting. This product is to be used in liquid or slurry treaters.

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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours. Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, waterproof gloves, shoes plus socks, protective eyewear.

Stored Seed Protection:

Applied at labeled rates equal to or above 0.8 fl. oz. per hundredweight, GAUCHO 600 Flowable will provide protection to seed against injury from the following insects: Indian Meal Moth (*Plodia interpunctella*), Rice Weevil (*Sitophilus oryzae*), Red Flour Beetle (*Tribolium castaneum*), and Lesser Grain Borer (*Rhizopertha dominica*). It is recommended that seed with existing populations of stored grain pests be fumigated prior to treating and bagging seed.

For Early Season Protection Against Certain Sucking Insects:

GAUCHO 600 Flowable will aid in the protection of seeds and seedlings against injury by certain early season insects.

Canola, Rapeseed and Mustard Seed:

To provide early season protection of seedlings against injury by aphids, flea beetles and wireworms apply as a commercial seed treatment at 10.24 to 25.6 fl. oz. per hundredweight of seed. In areas where flea beetle and foliar insects are in high numbers, the higher application rate is recommended. Please consult your local agricultural office for pest patterns, history, and forecasts to assist in determining the appropriate rate for your region.

For suppression of Lygus bugs, including *Lygus spp.*, in their second generation and cabbage Seedpod Weevil larvae, including *Ceutorhynchus assimilis*, apply 15.36 to 25.6 fl. oz. per hundredweight of seed.

Canola, Rapeseed and Mustard Seed: For End-Use Application At Agricultural Establishments:

Apply using an HCBT or a Batch Treater. Shake GAUCHO 600 Flowable thoroughly before use. Apply 5.1 to 12.8 fl. oz. of GAUCHO 600 Flowable per 50 pound bag. GAUCHO 600 Flowable may be diluted with an approved Gustafson fungicide mixture for extended disease protection. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Field Corn:

For the protection of corn plants from the corn insect pests listed below. Apply as a seed treatment at the recommended rates listed.

GAUCHO® 600 FLOWABLE

PEST	GAUCHO® 600	
	MG.AI / KERNEL	FL.OZ. / 80,000 UNITS OF SEED
Corn root worm (including Northern, Western, Southern and Mexican) ¹ Flea beetle Chinch bug Southern green stinkbug White grub Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Southern corn leaf beetle Billbug ² Grape colaspis ² Black cutworm ³	1.34	6.0

PEST	GAUCHO® 600	
	MG.AI / KERNEL	FL.OZ. / 80,000 UNITS OF SEED
Flea beetle Chinch bug Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Grape colaspis ² White grub	0.60	2.70

PEST	GAUCHO® 600	
	MG.AI / KERNEL	FL.OZ. / 80,000 UNITS OF SEED
Seed corn maggot (seed protection only) Wireworm (seed protection only) Flea beetle (through 1 leaf stage) Imported fire ant White grub ⁴	0.16	0.72

¹ In areas of heavy to severe corn rootworm populations, protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult your State Agricultural Extension Service on levels of corn rootworm populations.

² Reduces early season feeding damage.

³ Will reduce feeding damage caused by leaf feeding black cutworms that are 1/2 inch or less in length.

⁴ Reduces feeding damage during emergence and seedling stages.

Field Corn: For End-Use Application At Agricultural Establishments:

Apply using an HCBT or an Eight-Bag Batch Treater. Shake GAUCHO 600 Flowable thoroughly before use. Dilute GAUCHO 600 Flowable with water and/or an approved Gustafson fungicide mixture. The final slurry rate should be adjusted to apply a rate of 8 - 10 fl. oz. of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Allow mixing until seed is thoroughly covered. Apply 0.75 oz. of dry TALC per 50-pound bag of seed following the GAUCHO 600 Flowable application and allow it to distribute evenly on the seed.

Wheat, Barley:

To provide early season protection of seedlings against injury by aphids (including Bird cherry-oat, English grain, Greenbug, and Russian wheat aphid), Hessian fly, apply 0.8 to 2.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. Low use rate for "wireworm-only" protection: GAUCHO 600 applied at the 0.13 - 0.26 fl. oz. per hundredweight of seed offers suppression of wireworm activity on seed and young seedlings. To

provide early season protection from grasshopper damage, GAUCHO 600 should be applied to seed at 1.2 to 2.4 fluid ounces per hundredweight. To reduce early season damage caused by grasshopper, GAUCHO treated seed may be planted as a 50 to 60 foot border around the edges of the field. Consult your local university extension entomologist for details regarding grasshopper control in your area. For maximum effectiveness, seed should be treated uniformly. 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.

Wheat, Barley: For End-Use Application At Agricultural Establishments:

Apply using a Total Slurry Treater (TST), Farmer Applied Seed Treater (F.A.S.T.), Gustafson Air Pressure System (GAP) or other on-farm seed treating equipment to deliver accurate rates of GAUCHO 600 Flowable to achieve optimum product performance. Apply 0.8 – 2.4 fl. oz. per hundredweight of seed. GAUCHO 600 Flowable should be combined with a Gustafson fungicide product for seed and seedling protection against fungal pathogens, as well as insect pests. Dilution with water may be necessary depending on fungicide formulation used. GAUCHO 600 Flowable may also be applied on-farm as an over-treatment to seed pretreated with a fungicide. In this case, dilution is necessary. 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 6.4 fluid ounces per hundredweight 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.

Sorghum: For End-Use Application At Agricultural Establishments:

Apply using an HCBT or an Eight-Bag Batch Treater. Shake GAUCHO 600 Flowable thoroughly before use. Dilute 3.2 fluid ounces of GAUCHO 600 Flowable with water. The final slurry rate should be adjusted to apply a rate of 8 - 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered. Apply 0.75 oz. of dry TALC per 50-pound bag of seed following the GAUCHO 600 Flowable application and allow it to distribute evenly on the seed. 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 4.8 to 6.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment so as to ensure thorough coverage.

Cotton (Delinted Seed Only): For End-Use Application At Agricultural Establishments:

Apply using an HCBT or an Eight-Bag Batch Treater. Shake GAUCHO 600 Flowable thoroughly before use. Dilute 2.4 to 3.2 fluid ounces of GAUCHO 600 Flowable with water or a ready to use fungicide mixture, such as Gustafson RTU® -VITAVAX® -Thiram or ALLEGIANCE™ -FL. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

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 2.4 to 5.0 fluid ounces of GAUCHO 600 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). Apply in a film coat directly to raw seed (100,000 seed or approximately 1 kilogram by weight) at a rate of 2.4 fluid ounces per unit of seed. If rates exceed 2.4 fluid ounces per unit, seed must be pelleted.

Sweet Corn:

(Not registered for use in California)

For the protection of sweet corn plants from the insect pests listed below. Apply as a seed treatment at the recommended rates listed.

PEST	GAUCHO 600 FL. OZ. / CWT. OF SEED
Flea beetle Early season corn leaf aphid Seed corn maggot Wireworm	6.4
Imported fire ant Early season corn leaf aphid Seed corn maggot Wireworm	3.2 - 6.4
Imported fire ant Seed corn maggot (seed protection) Wireworm (seed protection)	1.6 - 3.2
Wireworm (seed protection)	0.8 - 1.6

The final slurry rate should be adjusted to apply a rate of 16 - 20 fl. oz. of dilute solution per hundredweight of seed with commercial application equipment.

Popcorn:

(Not registered for use in California)

To provide early season protection of seedlings against injury by flea beetles, apply as a commercial seed treatment at 6.4 fl. oz. per hundredweight of seed.

Adzuki Bean, Asparagus Bean, Broad Bean (Succulent Or Dry), Catjang Bean, Chinese Longbean, Field Bean, Guar Bean, Jackbean, Kidney Bean, Lablab Bean, Lima Bean (Succulent Or Dry), Moth Bean (Succulent Or Dry), Mung Bean, Navy Bean, Pinto Bean, Rice Bean, Runner Bean, Snap Bean, Sword Bean, Tepary Bean, Urd Bean, Wax Bean, Yardlong Bean, Blackeyed Pea (Succulent Or Dry), Chickpea, Cowpea (Succulent Or Dry), Crowder Pea, Dwarf Pea, Edible-Pod Pea, English Pea, Field Pea, Garden Pea, Green Pea, Pigeon Pea (Succulent Or Dry), Snow Pea, Southern Pea (Succulent Or Dry), Sugar Snap Pea, Grain Lupin, Sweet Lupin, White Lupin, White Sweet Lupin, Lentil:*

To provide early season protection of seedlings against injury by wireworm, bean leaf beetle, imported fire ant, and aphid, apply as a commercial seed treatment at 1.6 - 3.2 fl. oz. per hundredweight of seed prior to planting.

- Seed-and-pod vegetable seed treated in California must be destined for planting in states other than California and is not to be planted in California.

Carrot:

(Not registered for use in California)

To provide early season protection of seedlings against injury by seed corn maggot and wireworm, apply as a commercial seed treatment at 6.4 fl. oz. per hundredweight of seed.

ROTATIONAL CROPS:

Treated areas may be replanted with any crop specified on an imidacloprid label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back intervals should be observed for listed crops:

ROTATIONAL PLANT-BACK INTERVALS*				
IMMEDIATE PLANT-BACK				30-DAY PLANT-BACK
Artichoke	Cranberry	Mustard Seed	Strawberry	Cereals, including: Buckwheat millet oats rice rye triticale Safflower Soybean
Barley	Cucurbits	Okra	Sugarbeet	
Brassica (cole) leafy veg.	Eggplant	Pepinos	Tomatillo	
Canola	Ground cherry	Pepper	Tomato	
Cilantro	Leaf petiole veg.	Popcorn	Turnip greens	
Corn, Field	Leafy veg.	Potato	Veg. Root and Tuber	
Corn, Sweet	Legume veg. (succulent or dried, except soybean)	Rapeseed	Watercress	
Cotton		Sorghum	Wheat	

GAUCHO® 600 FLOWABLE

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

NOTIFICATION of the crop rotational restriction must be conveyed 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 600 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.

USE RESTRICTION:

Rape greens grown and harvested from GAUCHO 600 treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from GAUCHO 600 treated seed is only for industrial uses and can not be used for edible oil or any other human / feed consumption.

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: Contact Gustafson or your chemical supplier for container return instructions. If container is not returned in accordance with instructions, 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.

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 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 LLC. If these terms are not acceptable, return all products to the place of purchase, unopened for a full refund.

ALLEGIANCE is a registered trademark of Gustafson LLC, Plano, Texas