

11/27/2000

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NOV 27 2000

Terre R. Farrell
 Registration Specialist
 GOWAN COMPANY
 P. O. Box 5569
 Yuma, AZ 85366

SUBJECT: Label Amendment - Interim Reregistration Eligibility Document
 Betasan 3.6 G, EPA Reg. No. 10163-199
 Your Letter Dated October 12, 2000

The above mentioned amendment submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable provided you make the required changes listed below:

1. Under the "Precautionary Statements" remove "wear goggles or safety glasses when handling" and "wash thoroughly with soap and water after handling and before eating or smoking".
2. Under the "PPE"
 "Applicators using a push type spreader, and all loaders:" change
 "chemical resistant gloves" to chemical resistant gloves such as barrier laminate or viton \geq 14 mil."
 "chemical resistant footwear" to "shoes plus socks"

CONCURRENCES

SYMBOL	7505C							
SURNAME	MINOR, E.							
DATE	Nov 27, 2000							

"a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH-approved number prefix TC-21C or a NIOSH-approved respirator with any N, R, P or HE filter" to "a NIOSH-approved respirator with any N, R, P or HE filter"

add "protective eyewear"

"All other applicators & handlers must wear:"

"chemical resistant gloves" to chemical resistant gloves such as barrier laminate or viton \geq 14 mil."

"chemical resistant footwear" to "shoes plus socks"

"a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH-approved number prefix TC-21C or a NIOSH-approved respirator with any N, R, P or HE filter" to "a NIOSH-approved respirator with any N, R, P or HE filter"

add "protective eyewear"

add "In addition tot he above, for hire applicators (golf course and non-golf course employees) must wear a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH-approved number prefix TC-21C or a NIOSH-approved respirator with any N, R, P or HE filter.

- 3. It is recommended that the "Statement of Practical Treatment" be changed to "First Aid" and placed on the front panel directly under the header "Precautionary Statement" and revised as follows:

If swallowed:

- 1. 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 by a poison control center or doctor

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.
- Call a poison control center or doctor for treatment advice.

If on skin:

- 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:

- 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.

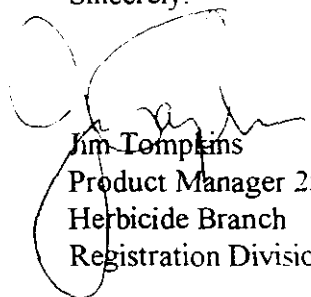
Have the product container or label with you when calling a poison control center or doctor or going for treatment.

3. It is recommended that the "Note to Physician" and any other "Notes" be placed directly below the "First Aid" section.
4. Add the "User Safety Recommendations" box immediately following the "PPE" requirements and add "Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet."
5. Remove the "Engineering Control Statement" this product is not subject to WPS.
6. Under the "Environmental Hazard" statement remove the second "Do not apply directly to water, or to areas where surface water is present or to intertidal areas below mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash waters".
7. It is recommended that the "General Use Precautions" subheading be changed to "General Use Precautions and Restrictions" and placed under the "Direction For Use" and all precautions and restrictions be placed in this section.
6. It is recommended that the "Product Information" heading be changed to "General Information" and placed as a subheading under the "Direction For Use" section.

- 7. Remove the heading "Directions for Application" and add the heading "Direction For Use".
- 8. It is recommended that the subheading "Rates of Application" be changed to "Application Instructions".

Submit one (1) copy of your final printed labeling before you release the product for shipment. The amended labeling supersedes all previously accepted ones. A stamp copy of the labeling is enclosed for your records.

Sincerely,



Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505C)

Enclosure

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Betasan[®] 3.6 G

A Selective Herbicide for Preemergence Control of Crabgrass and Annual Bluegrass in Turf, Ornamentals, and Ground Covers

ACTIVE INGREDIENT: Bensulide	% By Wt.
S-(O,O-diisopropyl phosphorodithioate) ester of N-(2-mercaptoethyl) benzenesulfonamide	3.6%
OTHER INGREDIENTS	96.4%
	TOTAL 100.0%

Contains 3.6 pounds of active ingredient per 100 pounds

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Avoid breathing dust. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Wash thoroughly after handling and before eating or smoking. Wash all contaminated clothing with soap and hot water before re-use. Avoid contamination of food, feed and water supplies.

STATEMENT OF PRACTICAL TREATMENT

If a known exposure occurs or is suspected, immediately start the procedures given below and simultaneously contact a Poison Control Center, a physician, or the nearest hospital.

NOTE: Be sure to advise the person contacted that the active ingredient in this compound is a cholinesterase inhibitor. Describe the type of exposure, the victim's symptoms, and follow the advice given.

NOTE TO MEDICAL PERSONNEL: Should cholinesterase inhibition occur, atropine by injection is antidotal. 2-PAM (Proton Chloride) is also antidotal when administered early and in conjunction with atropine.

IF SWALLOWED: Give several glasses of water and induce vomiting by placing a finger on the back of the victim's tongue. Give fluids until vomitus is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

IF ON SKIN: Flush all affected areas with plenty of water for several minutes. Remove and clean contaminated clothing and shoes. Seek medical attention of irritation occurs.

IF IN EYES: Immediately flush eyes with large amounts of running water for a least 15 minutes. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention immediately.

IF INHALED: Remove to fresh air. Seek medical attention if respiratory irritation occurs or if breathing becomes difficult.

NOTE TO PHYSICIAN: Should cholinesterase inhibition occur, atropine by injection is antidotal. 2-PAM (protopam chloride) is also antidotal when administered early and in conjunction with atropine.

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 G on an EPA chemical resistance category selection chart.

Applicators using a push type spreader and all loaders must wear:

- Coveralls over long-sleeved shirt and long pants
- Chemical resistant gloves
- Chemical resistant footwear plus socks
- A NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with and N², R, P, or HE Filter.

All other applicators and handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves
- Shoes plus socks
- In addition to the above, for-hire applicators (non-golf course employees) must wear a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with a N², R, P, or HE filter (due to risk from repeated exposures) when applying this product to golf courses)

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

When handlers use enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

NET CONTENTS: _____ POUNDS



ACCEPTED
with COMMENTS
In EPA Letter Dated

NOV 27 2000

EPA Reg. No: 10163-199
EPA Est. No: 7401-TX-1

Gowan Company
P.O. Box 5569
Yuma, AZ 85366-5569

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

10163-199

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ENVIRONMENTAL HAZARDS

This chemical is toxic to fish and aquatic invertebrates. 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 washwater or rinsate. Do not apply when weather conditions favor drift from the treated area.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

Do not apply directly to water, or to area where water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

This product may impair reproduction in birds if used during the breeding season.

GENERAL USE PRECAUTIONS

IMPORTANT: THIS PRODUCT WILL NOT WORK UNLESS IT IS WATERED IN FOR 10-15 MINUTES. FOR SAFETY REASONS, WATER THIS PRODUCT IN AS SOON AS POSSIBLE FOLLOWING APPLICATION FOR 10-15 MINUTES AND DO NOT ALLOW CHILDREN OR PETS ON TREATED AREAS UNTIL DRY FOLLOWING THE WATERING.

WATERING-IN MUST BE PERFORMED BY THE COMMERCIAL APPLICATOR OR THE COMMERCIAL APPLICATOR MUST PROVIDE THE ABOVE WATERING-IN INSTRUCTIONS TO THE RESIDENT IN WRITING USING BOLD FACE TYPE AND/OR RED PRINT OR OTHER METHODS TO ENSURE THE WARNING IS PROMINENTLY DISPLAYED ON THE MATERIAL PROVIDED TO THE RESIDENT.

- Do not apply this product in a way that will contact workers or other persons
- For use only on golf courses (greens, tees and bentgrass fairways only) and on residential lawns
- Do not use on parks, recreational areas, or other public sites.
- Applications on bentgrass fairways is limited to the following states: (OH, PA, NY, MI, CT, MA, IN, IL, NJ, WV, MN, WI, VT, NH, RI, DE, MD, VA). Applications on bentgrass fairways may only be made in the Fall and are limited to one application per year.
- Applications to greens and tees are limited to two per year.
- This product may only be applied by tractor drawn spreader or by push-type spreader
- Hand-held rotary broadcast spreaders are prohibited.
- Betasan should be used only for recommended uses and at recommended rates.
- Sweep up spills on walks or patios and hose area.
- Do not allow children or pets on treated lawns until Betasan has been watered into the soil and the grass is completely dry.
- Do not contaminate any body of water by direct application, cleaning of equipment, or disposal of wastes
- Toxic to fish. Do not contaminate any body of water by direct application, cleaning of equipment, or disposal of wastes and containers.

WEEDS CONTROLLED

- Smooth Crabgrass (*Digitaria ischaemum*)
- Hairy Crabgrass (*Digitaria sanguinalis*)
- Redroot Pigweed (*Amaranthus retroflexus*)
- Barnyardgrass (*Echinochloa spp.*)
- (Watergrass)
- Lambsquarters (*Chenopodium album*)
- Goosegrass (*Eleusine indica*)
- Annual Bluegrass (*Poa annua*)
- Shepherdspurse (*Capsella bursa-pastoris*)
- Deadnettle (Henbit) (*Lamium spp.*)

PRODUCT INFORMATION

Betasan is recommended for use on home lawns, ~~parks, and golf courses, on ornamental plants, and on ground covers~~ for control of crabgrass, annual bluegrass, and other annual weeds listed above.

DIRECTIONS FOR APPLICATION

- This product may only be applied by a push-type spreader. Hand-held rotary broadcast spreaders are prohibited.
- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- Application of Betasan must precede emergence of weeds from the soil. Crabgrass will emerge from the soil from four to six weeks before it is visible above lawn sod. If weeds are visible above the soil, it is too late to apply Betasan.
- Remove leaves, dead or tall grass, and other debris before applying Betasan to turf areas. Any weeds present ~~around ornamentals~~ must be removed or worked into the soil before applying Betasan.
- Betasan is recommended for mineral soils only.
- Do not apply peat moss to lawn, ~~ground covers, or established ornamentals~~ before treating with Betasan.

TIMING OF APPLICATION – GENERAL COMMENTS

Grass Lawns: Betasan should be applied only to well established grass lawns. Betasan can be used on the following established turf grasses:

Bahia	Centipede	Poa Trivialis
Bentgrass spp.	Fescue spp.	Saint Augustine
Bermudagrass spp.	Pensacola Bahia	Red Top
Perennial Bluegrass spp.	Perennial Ryegrass	Zoysia

Dichondra Lawns: Betasan can be applied to dichondra lawns at the time of seeding or any time thereafter.

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Ornamentals and Ground Covers: Betasan should be applied only to the following well established ornamentals and ground covers:

Alyssum	Coral Bell	Pachyandra
Aster	Daisy	Stock
Bachelor's Button	Marigold	Sweet Pea
Calendula	Ransy	Wall Flower
Candy-Tuft	Primrose	Zinnia
Daffodil	Gladiolus	Ranunculus
Dahlia	Narcissus	Tulip
Freesia	Juniper	Pyracantha
Aselia	Monterey Cypress	Sandankwa
Azalea	Monterey Pine	Star Jasmine
Azara	Myrtle	Tobira
Saxwood	Hypericum	Periwinkle
Lygia	Ice Plant	Sedum
Campanula	Ivy	Wild Strawberry
Gazania		

For control of crabgrass, apply Betasan at recommended rate (see **RATES OF APPLICATION**) anytime from fall – September or October – through early spring, for spring and summer control. With a late winter or early spring application, the application must be made prior to crabgrass emergence (see **DIRECTIONS FOR APPLICATION**).

For control of annual bluegrass and other annual weeds, apply Betasan at the recommended rate (see **RATES OF APPLICATION**) before the weeds emerge from the soil.

In southern or western states where germination of crabgrass, annual bluegrass, and other weeds extends into the late summer and early fall, a second application of Betasan at the recommended rates should be made four to five months after the initial application.

Betasan should be applied with a push type spreader or any other applicator that will give uniform coverage. A more uniform application can be made by spreading half the required amount of Betasan over the area to be treated, then applying the remainder at right angles or crosswise. Avoid misses by overlapping slightly. Sprinkle the area with water for 10 to 15 minutes after application to wash the Betasan down into the soil where the weed seeds are located.

Consult weed specialists of the State Agricultural Experiment Station or the State Agricultural Extension Service for additional information, as the timing and rate of application needed will vary with local conditions.

RATES OF APPLICATION

Crabgrass Only: Apply 12 pounds of Betasan 3.6G uniformly over 2,500 square feet.

Annual Bluegrass and Other Annual Weeds: Apply 20 pounds of Betasan 3.6G uniformly on 2,500 square feet.

RESEEDING

Any material that provides effective control of annual grasses may affect new lawn grass seedlings which germinate after treatment. Proper fertilization and watering will encourage the existing turf grass to fill in the thin or bare spots formerly occupied by crabgrass.

The following procedures are suggested in order to minimize any stunting of turf grasses which may occur when reseeding into Betasan-treated areas:

- 1 Do not reseed within 4 months after application.
- 2 Renovate the area to be reseeded by raking thoroughly to scarify the soil surface. Where practical, mix peat in with the soil to provide an optimum seed bed.
- 3 When turf diseases or physiological disorders necessitate reseeding sooner than 4 months after Betasan application, apply powdered activated charcoal prior to reseeding to deactivate the Betasan. Apply the activated charcoal at a rate of 7 pounds per 1,000 square feet in 14 gallons of water per 1,000 square feet (300 pounds per acre in 600 gallons of water per acre). Following application, irrigate the turf with sufficient water to wash the charcoal into the soil. Reseed no sooner than 7 days after applying the charcoal.

STORAGE AND DISPOSAL

DO NOT contaminate water, food, or feed by storage or disposal. Store in a cool, dry, well-ventilated area away from food or feed.

PESTICIDE DISPOSAL: Pesticide or equipment rinsate that cannot be used according to label instructions may be disposed on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or burn if allowed by state and local authorities. Stay out of smoke during burning. Do not reuse container.

FOR 24-HOUR EMERGENCY ASSISTANCE (SPILL, LEAK, OR FIRE), CALL CHEMTREC® (800) 424-9300.
For other product information, contact Gowan Company or see Material Safety Data Sheet.

NOTICE ON CONDITIONS OF SALE

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.