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

MAR 14 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Barbara Brown  
DREXEL CHEMICAL CO.  
BOX 9306  
MEMPHIS, TN 38109

Subject: Label Amendment Submission of 09/28/93 in Response to PR Notice 93-7  
EPA Reg. No. 19713-145  
DREXEL D-264 CAPTAN SEED PROTECTANT

**IMPORTANT NOTICE:** This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**SERIOUS ERROR(S) ON SUBMITTED LABELING:**

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

**YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING.** Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

**YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.**



**Recycled/Recyclable**  
Printed with Soy/Candla Ink on paper that contains at least 50% recycled fiber

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Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director  
Compliance Division, (7203)  
Worker Protection Notification  
Office of Compliance Monitoring  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

**IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.**

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling as amended

**AND**

- **WITHIN** one year from date of this acceptance.

Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

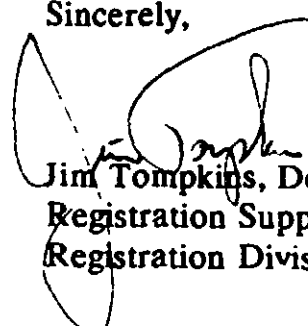


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Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Barbara Brown  
DREXEL CHEMICAL CO  
BOX 9306  
MEMPHIS TN 38109

Subject: Comment Sheet for EPA Reg Nr.19713-145  
DREXEL D-264 CAPTAN SEED PROTECTANT

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

The requirement under the heading "Personal Protective Equipment" must state: "Applicators and other handlers must wear:". Cross out your lead-in statement and replace it with correct one. EXCEPTION: If you have an entirely separate PPE section specifying what "Mixers and loaders must wear", the requirement under the heading "Personal Protective Equipment" must state: "Applicators and other handlers (other than mixers and loaders) must wear:". Cross out your lead-in statement and replace it with the correct one.

Add the following User Safety Recommendation to the label in the location shown in Section A on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing."

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing."

The apron requirement for "mixers and loaders" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Chemical-resistant apron when mixing or loading" under "Mixers and loaders must wear:". The exact location is shown in Sections A and C on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7.



DREXEL CHEMICAL CO  
EPA Reg. Number: 19713-145  
DREXEL D-264 CAPTAN SEED PROTECTANT  
Application date: 10/06/93  
Original Submission

The respirator requirement for "mixers and loaders" in the Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)" under "Mixers and Loaders must wear:". The exact location is shown in Sections A and C on Part 1 of the Product Worksheet in Supplement Three A to PR Notice 93-7. A D/M respirator is required as PPE for mixers/loaders.

Add "Organophosphate" to your label in one of the locations shown in Section E on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

The wording in the first two statements in the Non-Agricultural Use Requirements box on your proposed label is incorrect. Remove the incorrect statements and replace them with the following: "The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses."

Correct the typographical errors circled on your proposed label.

**RESTRICTED USE PESTICIDE**  
 Due to Avian and Aquatic Toxicity  
 For retail to and use only by Certified Applicators or persons  
 under their direct supervision and only for those  
 uses covered by the Certified Applicator's Certification.

**DREXEL  
 D-264-CAPTAN**

**SEED PROTECTANT**

**ACTIVE INGREDIENTS:**

DIAZINON (O,O-Diethyl O-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate).....	25.00%
*Captan.....	24.44%
Related Derivatives.....	0.56%
INERT INGREDIENTS:.....	50.00%
<b>TOTAL.....</b>	<b>100.00%</b>

\* N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

**KEEP OUT OF REACH OF CHILDREN  
 DANGER/PELIGRO**

**PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.**

**TRANSLATION---TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.**

**Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)**

**STATEMENT OF PRACTICAL TREATMENT**  
**IF SWALLOWED:** Drink promptly a large quantity of milk, egg whites, gelatin solutions, or if these are not available, drink large quantities of water. Avoid alcohol.  
**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. Call a physician.

See Side Panel For Additional Precautionary Statements.

EPA REG. NO. 19713-145	Manufactured by:
EPA EST. NO. 19713-MS-1	Drexel Chemical Company
	P. O. Box 9306
Net Contents:	Memphis, Tn. 38109-0306

WPS DELETIONS/REVISIONS 9/93

ACCEPTED  
 with COMMENTS  
 In EPA Letter Dated

MAR 14 1994

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
19713-145

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER: Corrosive:** Causes irreversible eye damage. ~~Be-not-get into-eyes-or-on-clothing--Wear-goggles-or-safety-glasses-~~ May cause contact sensitization following repeated contact with skin in susceptible individuals. ~~Avoid-repeated-contact-with-skin-~~ If sensitization reactions result, consult a physician. Harmful if swallowed or inhaled. ~~Remove-and-separately-laundry-clothing before-reuse-~~

#### PERSONAL PROTECTIVE EQUIPMENT

##### WPS USES:

Applicators and other handlers [who handle this pesticide for any uses covered by the Worker Protection Standard (40 CFR Part 170)- in general, agricultural plant uses] must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Protective eyewear

##### NON-WPS USES:

Applicators and other handlers [who handle this product for any uses NOT covered by the Worker Protection Standard (40 CFR Part 170) - in general, only agricultural plant uses are covered by WPS] must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Protective eyewear

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. 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

User should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

#### ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to birds, fish, and wildlife including waterfowl. Birds and waterfowl feeding or drinking on treated areas may be killed. Because of the migratory habits of certain Atlantic Coast waterfowl, do not apply this product in Nassau County, New York between November 1 and May 20. Do not exceed maximum permitted label rates. Rates above those recommended significantly increase potential hazards to birds and waterfowl. Avoid overlapping of dusts. Where irrigation (watering) is recommended apply a minimum of 0.25 inch of water immediately after application. Stop irrigation before puddling



occurs. 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. Keep out of lakes, streams, ponds, tidal marshes and estuaries (except for effluence from treated watercress beds). Do not apply to water that will be used for recreational purpose and human and livestock consumption. Shrimp and crab may be killed at applications rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources.

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

#### DIRECTIONS FOR USE

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

**DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.**

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

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 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 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. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

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

**NON-AGRICULTURAL USE REQUIREMENTS:**

Do not use on humans or permit children to go into treated areas until spray has completely dried. Keep out of reach of domestic animals. Do not permit pets to go into treated areas until spray has completely dried.

**PRECAUTIONS-FOR-USE**

Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and separately launder clothing before reuse.

Mixers/loaders when mixing and loading this product must wear a long-sleeved shirt and long pants or a coverall that covers all parts of the body except the head, hands and feet. Wear chemical resistant gloves, goggles or a face shield and chemically resistant apron.

A dust mask must be worn when mixing and loading this product.

**WORK SAFETY RULES**

REPEATED EXPOSURES TO CHOLINESTERASE INHIBITORS SUCH AS ARE CONTAINED IN THIS PRODUCT MAY, WITHOUT WARNING, CAUSE PROLONGED SUSCEPTIBILITY TO VERY SMALL DOSES OF ANY CHOLINESTERASE INHIBITOR.

Do not rub eyes or mouth with hands. If you feel sick in any way STOP work and get help right away. See Practical Treatment Section of this label.

**PERSONAL-PROTECTIVE-EQUIPMENT:** long-sleeved shirts, longlegged pants, shoes and socks, and chemical-resistant gloves.

Do not enter or allow entry into the treated area until the 24 hour reentry interval has expired, unless the person entering the area is wearing the personal protective equipment listed on the label.

Do not apply this product in a way that will contact unprotected workers, either directly or through drift. Only protected handlers may be in the area during application.

**AFTER-WORK:** Take off all clothes and shoes. Shower using soap and water. Do not wear contaminated clothing. Wash protective clothing and equipment with soap and water after each use. Personal clothing worn during use must be laundered separately from household articles. Clothing and protective equipment heavily contaminated or drenched with Captan must be destroyed according to State and local regulations.

D-264 Captan Seed Protectant gives temporary protection of germinating seed and seedlings of corn and soybeans from injury by seed corn maggots and seed corn beetles and gives temporary protection to seed from seed-borne and soil-borne fungi which cause seed decay and seedling blights.

This product contains graphite to assist in accurate planting.

Under some circumstances D-264 Captan Seed Protectant may affect the rate of seeding. It is necessary for the user to check planting rate frequently to assure himself that the desired planting rate is being obtained.

#### **MEASURING CUP ENCLOSED.**

#### **SPECIFIC DIRECTIONS**

**CORN:** Use 5 ozs. (3 level measuring cups) per bushel corn seed. Apply to seed as planter box is being filled. Stir with paddle or lathe so that each seed is coated with seed protectant. If temperature is high and soil moisture is low reduce dosage to one-half, especially for mid-season planting. **DO NOT USE BARE HANDS.** Excess product flows with the seed into the furrow giving additional protection against soil-borne diseases.

**SOYBEANS:** Mix 3 ozs. (1-1/2 level measuring cups) per bushel of seed in the planter box as a seed treatment prior to planting. Follow mixing instructions as above.

#### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment.

**STORAGE INSTRUCTIONS:** Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool dry area away from any heat or ignition source. Do not allow storage in a damp or humid area. Do not stack bags over 2 pallets high. Move bags carefully so as not to tear or puncture. Do not move from one area to another unless they are securely sealed to prevent dust from escaping. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Avoid contamination with acids and alkalis. Store in original containers only. If the contents are leaking or material is spilled follow these steps:

1. Collect and place in suitable containers for disposal.
2. Wash area with water and soap to remove remaining pesticide.
3. Follow washing with clear water rinse.
4. Do not allow run off to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below:

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate 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:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

#### **WARRANTY - CONDITION OF SALE**

**OUR RECOMMENDATIONS FOR USE** of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Drexel or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.