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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Ms. Barbara Brown Drexel Chemical Company P.O. Box 9306 2487 Pennsylvania Memphis, TN 38190

Dear Ms. Brown:

Subject: Amendment - Addition of Use - Seed Treatment Drexel Lindane Technical EPA Registration Number 19713-61 EPA Registration Number 19713-191 Your Applications Dated August 8, 1994

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA sec. 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment:

a. For both subject products, revise the Environmental Hazards statement to read as follows:

This product is toxic to fish, birds and other wildlife. Do not apply to any body of water. Do not contaminate water when disposing of equipment washwaters. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

CONCURRENCES		
SYMBOL A		
SURNAME		
DATE		
EPA Form 1320-1A (1/90)	Printed on Recycled Paper	OFFICIAL FILE COPY

3. Submit five copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

Sincerely yours,

George T. LaRocca Product Manager 13 Insecticide-Rodenticide Branch Registration Division (7505C)

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Enclosure

DREXEL Lindane Technical An Insecticide for Formulating Use Only

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> Keep Out Of Reach Of Children WARNING/AVISO

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

STATEMENT OF PRACTICAL TREATMENT IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Repeat until vomit fluid is clear. IF SPLASHED IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention. IF SPILLED ON SKIN: Immediately remove contaminated clothing, INCLUDING SHOES, and wash skin with soap and plenty of water. If irritation develops, send for a physician. IF INHALED: Remove victim to fresh air. Apply respirator if indicated.

EPA Reg. No. 19713-191 EPA Est. No. 19713-MS-1

REVISED: AUGUST 1, 1994

ACCEPTED with COMMENTS in EPA Letter Dated

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Under the Federal Insectionle, Fungionale, and Rodenticule. Art as punctuled for the pesticide registered under EPA Reg. No. 19713-191 PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING: MAY BE FATAL IF SWALLOWED: Do not breath vagors. Do not get on skin or in eyes. Can be absorbed through skin. Wash thoroughly with soap and water after handling and before eating or smoking. Keep clothing free of residue. Wash all contaminated clothing with soap and water before reuse. Do not contaminate feed or food stuffs ENVIRONMENTAL HAZARDS This product is toxic to fish, birds and other wildlife. Keep out of any body of water. Do not contaminate water by cleaning of equipment or disposal of waste. Do not discharge into lakes, streams, ponds, or public waters unless in accordance with an NPDES permit. For guidance contact your Regional Office of the Environmental Protection Agency.

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INSTRUCTIONS FOR FORMULATION: It is a violation of federal law to use this product in a manner inconsistent with its labeling. This pesticide may be used only for the formulation of an insecticide. Formulators using this product are responsible for obtaining EPA registration for their formulated products. See Use Section.

USE SECTION

For formulation only into end-use products for use as an insecticide to control insect pests on alfalfa (seed treatment only); apples; apricots; asparagus; avocados; barley (seed treatment only); beans (seed treatment only); beans, succulent (seed treatment only); beets (seed treatment only); broccoli; Brussels sprouts; cabbage; carrots (seed treatment only); cauliflower; celery; cherries; clover (seed treatment only); collards; corn (seed treatment only); cotton (seed treatment only); cucumber; eggplant; flax (seed treatment only); flowers; grapes; guavas; kale; kohlrab;; lentils (seed treatment only); lettuce; livestock-(beef-cattle-dogs,-goats,-hogs,-sheep) mangoes; melons; mushrooms; mustard greens; nectarines; oats (seed treatment only); okra; onions (bulb, dry); ornamental-trees-and shrubs; peaches; pears; peas (seed treatment only); pecans; pepuers; pineapples; plums including prunes; pumpkins; quinces; radishes (seed treatment only); rye (seed treatment only); safflower (seed treatment only); sorghum (seed treatment only); soybeans (seed treatment only); spinach; squash; summer squash; strawberries; sudangrass (seed treatment only); sugar beets (seed treatment only); sunflower (seed treatment only); Swiss chard; tomatoes; wheat (seed treatment only); farm-buildings-such-as-barns,-tivestock-pens,-stables-and-other butidings--Outdoor-areas-such-as-lawns--recreation-areas--camparcuidegolf-course--play-grounds--etc-

DOMESTIC OUTDOOR USE: Outdoor areas such as lawns, recreational areas, campgrounds, golf courses, play grounds, etc. Ornamental trees and shrubs

Farm buildings such as barns, livestock pens, stables and other buildings.



TERRESTRIAL NON-FOOD CROPS: Tobacco and ornamental plants

LIVESTOCK ANIMALS: Beef cattle, dogs, goats, hogs, horses, mules and sheep

STORAGE AND DISPOSAL Do not contaminate water, food, or feed by storage or disposal. 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 stack over 2 pallets high. Do not move containers from one area to another unless they are securely sealed. Keep containers tightly sealed when not in use. Do not allow material to become wet or store in a damp, humid area. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original container only. If the contents are leaking or material is spilled follow 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 clean water rinse. 4. Do not allow runoff to enter sewer or contaminate water supplies. 5. Dispose of waste as indicated below. Pesticide Disposal: Pesticide waste are toxic. Improper disposal of excess pesticide, spray mixture, or rinse 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. Completely empty liner by shaking and tapping Container Disposal: sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot by reused, disposed of in the same manner.

WARRANTY - CONDITION OF SALE:

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Drexel warrants that this product conforms to its chemical descriction and is reasonably fit for the purposes referred to in the directions for use. Drexel makes no other warranties express or implied including FITNESS or MERCHANTABILITY. In no case shall Drexel or the Selier be liable for consequential, special or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.

MANUFACTURED BY: Drexel Chemical Company P.O.BOX 9306,MEMPHIS,TN. 38103-0306