

pm 25 19713-259

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

DEC 10 1993

Barbara Brown
DREXEL CHEMICAL CO
BOX 9306
MEMPHIS, TN 38109

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/28/93 in Response to PR Notice 93-7
EPA Reg. No. 19713-259
DREXEL VERNAM 10G

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 reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (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 not been reviewed or 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:

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



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

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DREXEL CHEMICAL CO.
EPA REG NO.: 19713-259 07/28/93
DREXEL VERNAM 10G

Original Submission

The bodywear requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Long-sleeved shirt and long pants." The exact location is shown in Sections A and B on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Insert the following statement above the Agricultural Use Requirements box: "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." The exact location is shown in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

You have incorrect wording in the second-to-last sentence in the first paragraph in the Agricultural Use Requirements box on your proposed label. The sentence must be as follows: "It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval."
Take out notification to workers.

**IMPORTANT: RECALIBRATE YOUR EQUIPMENT
FOR THIS PRODUCT BEFORE USING**

**DREXEL
VERNAM 10-G**

GRANULES - A SELECTIVE HERBICIDE

ACTIVE INGREDIENT:

S-propyl dipropylthiocarbamate.....	10.0%
INERT INGREDIENTS:.....	90.0%
TOTAL:.....	100.0%

Contains 10 Pounds Active Ingredient Per 100 Pounds.

EPA REG. NO. 19713-259
EPA EST. NO. 19713-GA-1

Revisions 6/93

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

STATEMENT OF PRACTICAL TREATMENT
 If a known exposure occurs or is suspected, immediately start the procedures given below. If further treatment is required, contact a Poison Center, a physician, or the nearest hospital.

In case of a significant spill, call CHEMTREC 800/424-9300.

IF INGESTED: Immediately give large amounts of water and induce vomiting by gagging the victim with a finger placed on the back of the victim's tongue. Give fluids until vomit is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. Call a physician immediately.

FOR EYE CONTACT: Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart during flushing to ensure rinsing of the entire surface of the eye and lids with water. Call a physician.

FOR SKIN CONTACT: Wash all affected areas with plenty of soap and water. Seek medical attention if irritation occurs.

IF INHALED: Remove to fresh air. If not breathing, give artificial respiration, preferable mouth-to-mouth. If breathing is difficult, give oxygen, preferably with a physician's advice.

Manufactured By:
DREXEL CHEMICAL COMPANY
P.O. BOX 9306, MEMPHIS, TN 38109-0306

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 10 1993

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-259

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION. HARMFUL OR FATAL IF SWALLOWED. Avoid contact with skin, eyes and clothing. Avoid breathing of dust. Do not contaminate food and feed. Keep away from heat and flame.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

Coveralls

Waterproof gloves

Shoes plus socks

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

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

Remove clothing immediately if pesticides gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

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 by cleaning of equipment or disposal of wastes.

READ ENTIRE LABEL BEFORE USING

WEEDS CONTROLLED

VERNAM 10-G will not control established weeds.

ANNUAL GRASSES:

Barnyardgrass

(Watergrass)

(*Echinochloa crusgalli*)

Crabgrass (*Digitaria* spp.)

Giant Foxtail (*Setaria faberii*)

Green Foxtail (*Setaria viridis*)

Yellow Foxtail (*Setaria glauca*)

Foxtail Millet (*Setaria italica*)

Goosegrass (*Eleusine indica*)

Wild Cane* (*Sorghum bicolor*)

Johnsongrass Seedlings

(*Sorghum halepense*)

ANNUAL BROADLEAF WEEDS:

Carpetweed (*Mollugo*

verticillata)

Sicklepod (*Coffeeweed*)

(*Cassipourea*)

Florida Purslane (Florida

Pusley)(*Richardia scabra*)

Common Lambsquarters

(*Chenopodium album*)

Annual Morningglory

(*Ipomoea purpurea*)

Smooth Pigweed (*Amaranthus*

hybridus)

Redroot Pigweed (*Amaranthus*

retroflexus)

Purslane (*Portulaca oleracea*)

Velvetleaf (Buttonweed)

(*Abutilon theophrasti*)

*Cultivation is suggested in addition to the VERNAM 10-G treatments in fields with moderate or heavy infestations of wild cane.

The above listed broadleaf weeds will be controlled only if treatment is made when conditions are favorable for weed seed germination and growth.

PERENNIAL WEEDS:

- Yellow Nutsedge (Cyperus esculentus)
- Purple Nutsedge (Cyperus rotundus)

Existing stands of nutgrass must be turned under and chopped up thoroughly before treatment. For nutgrass control VERNAM 10-G must be thoroughly mixed into the soil prior to planting. Cultivation is suggested in addition to VERNAM 10-G treatment in fields with moderate or heavy nutgrass infestations.

GENERAL USE PRECAUTIONS

VERNAM 10-G should be used only for recommended purposes and at recommended rates (do not overdose).

Applied according to directions and under normal growing conditions, VERNAM 10-G will not harm the treated crop. Malformation of the primary leaves is not unusual. This condition is only temporary and will not affect yields. During germination and early stages of growth, extended periods of unusually cold and wet or hot and dry weather, insect or plant disease attack, the use of certain soil-applied systemic insecticides, improperly placed fertilizers or soil insecticides may create abnormal conditions that weaken crop seedlings. VERNAM 10-G used under these abnormal conditions could result in crop injury.

VERNAM 10-G is recommended for use on mineral soils only. Do not contaminate irrigation water or water used for domestic purposes.

Do not mix VERNAM 10-G with insecticides or fungicides.

DIRECTIONS FOR USE OF VERNAM 10-G

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

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 (WPS), 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), notification to workers, 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 12 hours.

EXCEPTION: If this product is soil-injected or soil-incorporated, the WPS, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

Personal Protective Equipment 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, soils or water is:

- Coveralls
- Waterproof gloves
- Shoes plus socks

VERNAM 10-G is a selective herbicide which is mixed (incorporated) into the soil, except where noted under RECOMMENDATIONS, for control of weeds listed on this label. VERNAM 10-G controls annual weeds as their seeds germinate by interfering with normal germination and seedling development. It does not control established weeds. All weed growth and crop stubble should be thoroughly worked into the soil before treatment.

APPLICATION DIRECTIONS

The soil should be well worked and dry enough to permit good soil mixing (incorporation). Use granular applicators designed to handle herbicide granules. Calibrate the applicator according to the manufacturer's directions prior to use and check frequently during application to be sure equipment is working properly and distributing the granules uniformly. Avoid overlaps that will increase dosage above recommended limits. When using certain broadcast applicators, a splash pan is needed to spread the granules and avoid concentration of the material in narrow bands. Broadcast applications before planting may be made by airplane.

INCORPORATION DIRECTIONS

With soil incorporation applications, VERNAM 10-G must be mixed (incorporated) into the soil immediately (within minutes) after application to prevent loss of herbicide. Whenever possible, application and incorporation should be done in the same operation.

SOIL MIXING (INCORPORATION) BEFORE PLANTING: Use power-driven cultivation equipment set to cut to a depth of 2 to 3 inches OR a tandem disc set to cut to a depth of 4 to 6 inches operated at 4 to 6 mph, followed by a spike-tooth harrow or some other leveling device which extends beyond the ends of the disc. For thorough mixing, disc in two different directions (cross disc). Prior to the second disking, raise the disc to prevent cutting deeper than 4 to 6 inches.

SOIL MIXING (INCORPORATION) AFTER PLANTING: Use power-driven cultivation equipment set to cut to a depth of 2 inches OR on light soils only, ground-driven tillers (rolling cultivators, rotary hoe, row wheels, etc) set to cut to a depth of 1-1/2 inches and operated at 6 to 8 mph. When incorporating after planting, care must be taken not to disturb the crop seed or seedlings. Adjust tines or blades of incorporation equipment so they are not directly over the drill row.

PLANTING - SOYBEANS, PEANUTS

Do not plant seed deeper than 2 inches. For VERNAM 10-G applications made before planting, seeding can be done immediately or it may be delayed up to 10 days. If it is necessary to work the soil following application and incorporation, but before planting, do not work the soil deeper than the depth the herbicide was incorporated. To avoid removing VERNAM 10-G from the row (with loss of weed control in the row) do not move or shape soil after treatment, such as by planting in deep furrows.

RECOMMENDATIONS

These recommendations are given in terms of broadcast (over-all) rates VERNAM 10-G per acre. For band or row applications, reduce broadcast rates proportionately depending on band width to be treated and row spacing.

PEANUTS:

VERNAM 10-G may be applied before planting, or immediately after planting. When incorporating after planting, care must be taken not to disturb the seed. Broadcast Rates Per Acre--20 pounds on sandy (light) soils, 25 pounds on sandy loam to clay loam (medium to heavy) soils.

SOYBEANS:

For Soybeans Grown in Midwestern, North Central and Northeastern States: VERNAM 10-G may be applied before planting by broadcasting 20 pounds on sandy (light) soils, or 25 pounds on sandy loam to clay loam (medium to heavy) soils.

VERNAM 10-G may also be applied at planting or immediately after planting by broadcasting 20 pounds on sandy (light) soils, 25 pounds on sandy loam to clay loam (medium to heavy) soils, and 30 pounds on clay (heavy) soils. When incorporating after planting, care must be taken not to disturb the crop seed or seedlings.

For Soybeans Grown In The Southeastern States including North Carolina, South Carolina, Georgia, Alabama, Florida, and Eastern Tennessee (Tenn. River East): VERNAM 10-G may be applied before planting or immediately after planting. For applications made before planting, do not plant in deep furrows or use shanks or other devices ahead of planter which bring up untreated soil to the surface. For furrow planted soybeans, apply VERNAM 10-G immediately after planting in bands over the row and incorporate with row wheels only. When incorporating after planting, care must be taken not to disturb the crop seed or seedlings. Broadcast Rates Per Acre--20 pounds on sandy (light) soils and 25 pounds on sandy loam to clay loam (medium to heavy) soils.

In The Midwest and North Central States Only: VERNAM 10-G may also be applied to the soil surface immediately after planting without mixing it into the soil by broadcasting 30 pounds on sandy (light) to clay (heavy) soils. This application method will not control nutgrass, Johnsongrass from seed, wild cane or velvetleaf. Also, rainfall of at least one-half inch in one rain is necessary to carry the chemical down to the germinating weed seeds. One or more light rains are not sufficient. Poor weed control will result if sufficient rain does not occur within 7 days after application. If sufficient rainfall does not occur, OR if weeds have emerged, rotary hoeing or standard cultivation should be done before weeds become well established.

For Soybeans Grown in the Southwestern States Including Arkansas, Louisiana, New Mexico, Texas, Oklahoma, Mississippi and Western Tennessee (Tenn. River West): VERNAM 10-G may be applied before planting. When incorporating at or after planting, care must be taken not to disturb the crop seed or seedlings. Broadcast Rates Per Acre--20 pounds on sandy (light) soils, 25 pounds on sandy loam to clay loam (medium to heavy) soils and 30 pounds on clay (very heavy) soils.

NOTE: If beds are made prior to planting soybeans, VERNAM 10-G may be applied in a band immediately ahead of the bedding discs set to cover the VERNAM 10-G with 3 to 4 inches of soil. If bed levelers are used before planting soybeans, make the beds higher to compensate for leveling, so 2 to 3 inches of soil remains over the treatment after the planting operation is done.

CULTURAL PRACTICES FOLLOWING APPLICATION

VERNAM 10-G is not persistent in the soil, and susceptible weeds germinating later during the growing season may not be controlled. Shallow cultivation may be necessary to control these late-germinating weeds. Do not cultivate deeper than the depth of the herbicide incorporation. Recommended preemergence or post-emergence herbicides may be applied over the top of preplant incorporated applications of VERNAM 10-G when necessary to control weeds resistant to VERNAM 10-G.

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. Move bags carefully so as not to tear or puncture. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Do not allow bags 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 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 clean water rinse.
4. Do not allow runoff to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below:

PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment, then dispose of empty bags 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.