

*Best
copy
available*

19713-387

05/24/2000

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Ms. Luz Piwonka
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

MAY 24 2000

Dear Ms. Piwonka:

Subject: Amendments: Delete unsupported uses per the Agency's
January 15, 1999 GDE Revocation Notice,
Revise rate of application to barley seed
Lindane Flowable Seed Protectant
EPA Registration Number 19713-387
Your submission dated March 12, 1999
and FAX received May 17, 2000

The amendments referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), are acceptable and a stamped copy of the revised label previously stamped on May 5, 1995 is enclosed for your records. When preparing the actual finished labeling please be sure to delete all the struck through text indicating the deleted unsupported uses and their associated directions for treatment of seeds for the crops beans, cantaloupes, cucumber, squash, watermelon, carrots, onions, cotton, lentils, peas, safflower, Sudan Grass, and sunflower. Please note that because CIEL has notified the Agency that it is no longer supporting registration/reregistration for celery, collards, kale, kohlrabi, mustard greens, and Swiss Chard, the label identified as "387SP-0399" is NOT acceptable. You may, however, add the five format changes that appeared on 387SP-0399 (and identified as items "3i" to "3v" in your cover letter) to the currently accepted label when preparing the finished labeling. Specifically, you may add the statement "See FIRST AID Below" on the front panel, change the heading "STATEMENT OF PRACTICAL TREATMENT" to "FIRST AID", delete the Exception from the Agricultural Use Requirements box, change "Federal Food and Drug Administration" to "U.S. Environmental Protection Agency"

regarding tolerances, delete a redundant sentence and add the words "and seedlings", and add the pests white grubs and seed corn beetles. Regarding the pest additions, the Agency assumes that you currently have efficacy data in your possession which shows the effectiveness on this product which only contains lindane against both those pests on seeds and/or seedlings.

Please submit 5 copies of the revised finished labeling as soon as it becomes available.

Sincerely,

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

DREXEL LINDANE FLOWABLE**ACTIVE INGREDIENT:**

Lindane: (Gamma isomer of benzene hexachloride)...30%

INERT INGREDIENTS:.....70%**TOTAL:**.....100%

This Product contains the toxic inert ingredient Rhodamine B

**KEEP OUT OF REACH OF CHILDREN
WARNING/AVISO**

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: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger.

Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician immediately.

REVISION DATE: January 17, 1995

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAY 24 2000**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
19713-387

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MAY 5 1995

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

WARNING: May be fatal if swallowed. May be absorbed through skin. Do not breathe spray mist. Causes skin and eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contamination of feed and foodstuffs. This product should be applied in a well-ventilated area.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category E on an EPA chemical resistance category selection chart. Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Chemical resistant gloves, such as barrier laminate or nitrile rubber or neoprene rubber or Viton

Shoes plus socks.

Dust/mist filtering respirator (MSHA/NIOSH approval prefix TC-21C).

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.

When handlers use closed systems, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40CFR170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS:

Users should:

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

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and wildlife. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Exposed treated seeds may be hazardous to birds or other wildlife. Dispose of all excess treated seeds by burial away from bodies of water. Do not contaminate water by cleaning of equipment or disposal of wastes.

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 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.

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 instruction 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 product is soil injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated areas 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

Chemical-resistant gloves, such as barrier laminate or nitrile rubber or neoprene rubber or Viton

Shoes plus socks

Mix thoroughly before use or use entire container at one time. LINDANE FLOWABLE may be tank mixed with Vitafax 200 Flowable Fungicide, Vitavax 34 Seed Treatment, Captan 4 Flowable Fungicide or Thiram Fungicide at the respective labeled rate. All other 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.

This product is to be used in liquid or slurry treaters.

The Federal Food and Drug Administration has set 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.

LINDANE FLOWABLE will protect seeds and seedlings against damage from wireworms and seed corn maggots.

GENERAL INFORMATION

This product is formulated to protect seeds against wireworms, seed corn maggots and certain other soil-borne insects. This product contains effective binding agents to hold the Lindane on the seed during sacking, storing, and planting. Apply in a slurry-type treater specifically designed and approved for that purpose or apply by hand in any suitable mixing equipment, such as home made rotary drums.

SEED	Dosage Rate/100 lbs. of Seed
Barley	1.4 fl oz
Beans	0.7 fl oz
Cabbage, Cauliflower, Broccoli, Brussels Sprout	4.9 fl oz
Cantaloupes, Cucumber, Watermelon, Squash,	
Carrots, Onions	2.7 fl oz
Cotton:	
Acid Delinted or Reginned	5.4 fl oz
Fuzzy undelinted	6.1 fl oz
Lentils	2.7 fl oz
Oats	1.4 fl oz
Peas	2.7 fl oz
Radishes	1.4 fl oz
Rye	1.4 fl oz
Safflower	1.4 fl oz
Sunflowers	2.7 fl oz
Sudan Grass	1.1 fl oz
Wheat	1.4 fl oz

Only seed of high germination with good vigor should be treated with Lindane. Poor seed may suffer greater injury. Treat seed not over six (6) weeks before planting. Store treated seed in a cool dry place until planting so that excess moisture will evaporate. If seed is stacked when wet, heat may develop which could impair germination.

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 21 CFR, Part 2.25. Any dye added to treated seed must be cleared for use under 40 CFR, Part 180.1001.

Labels attached to the treated seed must read:
Treated seed should not be used for or mixed with food or animal feed or processed for oil. Exposed treated seeds may be hazardous to birds and other wildlife. Dispose of all excess seed by burial away from bodies of water.

STORAGE AND DISPOSAL

1. **STORAGE:** Store in a cool place. Do not store in direct sunlight. Protect from freezing temperatures.
2. **PROHIBITIONS:** Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not re-use empty container.
3. **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.
4. **CONTAINER DISPOSAL:** 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, spray 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, except for the purposes of curative control of existing disease or insect pests, 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 Drexel Chemical Company, no claims are made to guarantee germination of carry-over seed.

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 conditional of sale by Drexel Chemical Company and is accepted as such by the Buyer.