

- 19713-387

10/26/2004

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

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

OCT 26 2004

Dear Ms. Chan:

Subject: Amendment - Revise label per Lindane RED  
Drexel Lindane Flowable  
EPA Registration Number 19713-387  
Your submission dated May 28, 2004

The amendment referred to above, submitted in connection with registration under with registration under FIFRA section 3(c)(7)(a), is acceptable and a stamped copy of the label is enclosed for your records. The following revisions should be made when preparing the finished labeling:

- a. In the ENGINEERING CONTROLS text, please revise "**and must:**" to read "**and handlers must:**".
- b. Also in the ENGINEERING CONTROLS, revise "wear the PPE required above handlers using a closed system" to read "wear the PPE required above for handlers using a closed system".
- c. In the **Note** about labels attached to the treated seeds, after "...away from bodies of water" add the following:

"Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 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 without restriction if there will be no contact with anything that has been treated."

Please submit five (5) copies of the revised amended label incorporating the above revisions as soon as it becomes available. As agreed upon, all new production of this product after the date of November 30, 2004 must bear the revised amended label.

Please note that this acceptance does not constitute reregistration of the subject product. Such determination will be made following completion of the Agency's review of data submitted in response to the associated Lindane Data Call-In Notice.

Sincerely,

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

OCT 26 2004

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

Drexel

# Lindane Flowable

Seed Protectant

## ACTIVE INGREDIENT:

Lindane (Gamma isomer of benzene hexachloride) .....	30.0%
OTHER INGREDIENTS: .....	70.0%
TOTAL: .....	100.0%

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.)

See FIRST AID Below  
SHAKE WELL BEFORE USING

EPA Reg. No. 19713-387

EPA Est. No. 19713-GA-1

Net Contents: \_\_\_\_\_

### FIRST AID

#### IF SWALLOWED:

- 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 do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious or convulsing person.

#### IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

#### IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

#### IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.  
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**WARNING:** May be fatal if swallowed or absorbed through skin. Harmful if inhaled. Causes skin and eye irritation. Do not get in eyes, on skin or on clothing. Avoid contamination of feed and food-stuffs. Do not store with food, feed or forage. This product should be applied in a well-ventilated area.

#### 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 E on EPA chemical resistance category selection chart.

(Continued)

### PRECAUTIONARY STATEMENTS (Continued)

**Handlers using closed systems and handlers planting or otherwise handling treated seed must wear:** Long-sleeved shirt and long pants, chemical-resistant gloves such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber or Viton, shoes plus socks and a chemical-resistant apron when mixing, loading or treating seeds on a farm.

**Handlers exposed to the concentrate while performing tasks such as equipment or spill clean-up, for which engineering controls are not feasible must wear:** Coveralls over long-sleeved shirt and long pants, chemical-resistant footwear plus socks, chemical-resistant gloves such as Barrier laminates or Viton, and a chemical-resistant apron.

See engineering controls for additional requirements.

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 exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

### ENGINEERING CONTROLS

Seeds must be treated using a closed system that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)] for dermal protection, and must: wear the PPE required above handlers using a closed system, wear protective eyewear if the system operates under pressure, and be provided and have immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown the PPE specified for handlers exposed to the concentrate that are performing tasks for which engineering controls are not feasible.

### USER SAFETY RECOMMENDATIONS

**Users should:** 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) 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.

### ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other 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 and other wildlife. Dispose of all excess treated seeds by burial away from bodies of water. Do not contaminate water by disposing of equipment washwaters. Apply this product only as specified on the label.

### GENERAL INFORMATION

This product is formulated to protect seeds and seedlings against Seed corn beetles, Seed corn maggots, White grubs, Wireworms and certain other soil-borne insects. This product contains effective binding agents to hold the product on the seed during sacking, storing and planting. Apply in a slurry-type treater specifically designed and approved for that purpose.

Manufactured By:

**Drexel Chemical Company**

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

## 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 (WPS), 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, 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 (REI). The requirements in this box only apply to the uses of this product that are covered by the WPS.

Do not enter or allow worker entry into treated areas during the REI of 24 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 without restriction 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 WPS and that involves contact with anything that has been treated, such as plants, soil, or water is: Coveralls worn over short-sleeve shirt and short pants, chemical-resistant gloves made of any waterproof material, and chemical-resistant footwear plus socks.

This product may only be used as a commercial or on-farm seed treatment for Barley, Wheat, Corn, Oats, Rye, and Sorghum.

Mix thoroughly before use or use entire container at one time. This product may be tank mixed with Vitavax®-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 precautions and limitations on labeling of all products used in mixtures.

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

The U.S. Environmental Protection Agency 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.

This product will protect seeds and seedlings against damage from Seed corn beetles, Seed corn maggots, White grubs and Wireworms.

Seed Crop	Dosage Rate per 100 Pounds of Seed
Barley .....	1.35 fl. ozs.
Corn .....	2.4 fl. ozs.
Oats .....	1.4 fl. ozs.
Rye .....	1.4 fl. ozs.
Sorghum .....	2.7 fl. ozs.
Wheat .....	1.4 fl. ozs.

4/4  
A plant-back interval of 30 days for Leafy vegetables and 12 months for all unregistered crops must be observed.

Only seed of high germination with good vigor should be treated with this product. 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 is 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: Persons handling treated seed must wear long-sleeved shirt and long pants plus chemical-resistant gloves made out of any waterproof material. Treated seed must 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

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited. Do not re-use empty container.

**PESTICIDE STORAGE:** Store in a cool place. Do not store in direct sunlight. Protect from freezing temperatures.

**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:** 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, stay out of smoke.

### WARRANTY—CONDITIONS OF SALE

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 and conditions beyond the control of the Manufacturer, 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 the Manufacturer 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 the Seller and is accepted as such by the Buyer.