

Best copy available

19713-401

05/31/2000

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

MAY 31 2000

Dear Ms. Piwonka:

Subject: Amendments: Delete unsupported uses per the Agency's  
January 15, 1999 GDE Revocation Notice,  
Minor format changes

Drexel Lindane 30%  
EPA Registration Number 19713-401  
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 identified as 401SP-0797 (which your cover letter identified as "401DR-0797") 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 "401SP-0399" is NOT acceptable. You may, however, add the four format changes that appeared on 401SP-0399 (and identified as items "3i" to "3iv" 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, delete a redundant sentence, and add the words "and seedlings".

Regarding the pest additions of white grubs and seed corn beetles which appeared on 401SP-0399 but which were not mentioned in your cover letter, 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. Please be aware that the labeling submitted to the Agency for an amendment must bear the master name of record, not an additional brand name. For this product the master name of record is "Drexel Lindane 30%", while "Drexel Lindane 300 Flowable Seed Protectant" is just an additional brand name. When submitting the revised labeling, please be sure that it bears the master name of record. If you wish to change the master name of record to what is now only an additional brand name, then you must express this in your cover letter as an amendment with your next label submission for this product.

Sincerely,

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



ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

MAY 31 2000  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
19713-401

# Lindane 300 Flowable

## Seed Protectant

**ACTIVE INGREDIENT:**

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

**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.)

Read Entire Label Before Using This Product  
SHAKE WELL BEFORE USING

EPA Reg. No. 19713-401  
EPA Est. No. 19713-GA-1

**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 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 area with soap and water.  
**IF IN EYES:** Flush eyes with plenty of water. Call a physician immediately.

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**  
**WARNING:** May be fatal if swallowed or absorbed through skin. Causes substantial but temporary eye injury. Harmful if inhaled. Causes skin irritation. Do not get in eyes, on skin or on clothing. Avoid breathing vapors. 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.  
 Applicators and other handlers must wear: Coveralls over short sleeved shirt and short pants, waterproof gloves, chemical resistant footwear and a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).  
 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 (40 CFR 170.240 (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, 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 the 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, and certain circumstances, allows workers to enter the treated area 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: Chemical-resistant gloves, such as barrier laminate or nitrile rubber or neoprene rubber or Viton and shoes plus socks.

Mix thoroughly before use or use entire container at one time. LINDANE 300 FLOWABLE may be tank mixed with Vitavax™ 200 Flowable Fungicide, Vitavax™ 34 Seed Treatment, Captan 4 Flowable Fungicide or Thiram Fungicide at the respective labeled rates. 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 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.  
 LINDANE 300 FLOWABLE will protect seeds and seedlings against damage from wireworms and seed-born maggots.

Manufactured by:  
**Drexel Chemical Company**  
 P.O. BOX 13327, MEMPHIS, TN 38113-0327  
**SINCE 1952**

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**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 treator specifically designed and approved for that purpose.

SEED CROP	DOSAGE RATE / 100 LBS. OF SEED
Barley	1.35 fl. ozs.
Beans	6.7 fl. ozs.
Broccoli, Brussel sprouts, Cabbage, Cauliflower, Cauliflower, Cucumber, Eggplant, Watermelon	4.0 fl. ozs.
Corn, Onions	3.7 fl. ozs.
Cotton	6.4 fl. ozs.
Acid Dye-dyed or Registered	6.4 fl. ozs.
Paddy - Unbleached	7.2 fl. ozs.
Leaves	7.2 fl. ozs.
Oats	1.4 fl. ozs.
Peanut	2.7 fl. ozs.
Radishes	1.4 fl. ozs.
Rye	1.4 fl. ozs.
Soybean	6.4 fl. ozs.
Soybean - green	1.4 fl. ozs.
Sunflower	2.7 fl. ozs.
Wheat	1.4 fl. ozs.

Only seed of high germination with good vigor should be treated with LINDANE 300 FLOWABLE. 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**

Do not contaminate water, food or feed by storage or 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 - CONDITION OF SALE**

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor viability, 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 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 of 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.