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NOV 10 1987

Ms. Dorothy S. Travis
Agricultural Products Company, Inc.
P.O. Box W
Greeley, CO 80632

Dear Ms. Travis:

Subject: Amendment - Toxic Inert Warning Statement and Formulation
and Label Review Request in Response to Lindane
Registration Standard
Lindane 25 EC Seed Treater
EPA Registration No. 43789-14
Your Applications Dated January 10, 1986
and October 15 and 30, 1987

The October 30 labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling.

1. Xylene is no longer considered an active ingredient. Include xylene in the overall percentage of inert ingredients in the ingredient statement. Because of the aspiration hazard presented by xylene add the following statement in a footnote to the inert ingredients: "Contains Xylene."
2. On the Confidential Statement of Formula (CSF) please provide the pH of this product in a specified amount of water. Also provide the flashpoint of this formulation.
3. Please revise the lower certified limit for lindane in the CSF. This lower limit must not fall below the label claim.
4. Our records show that Gustafson, Inc. no longer possesses a label for Lindane Technical (EPA Registration No. 7501-101). Please revise your CSF to reflect the transfer of this label to Tri Cal, Box B27, Hollister, California 95024 (EPA Registration No. 11220-19).

16162:I:Stevenson:LR-11:KENCO:11/5/87:11/17/87:rw:EK:LF:CB

CONCURRENCES

SYMBOL	ORIGINATOR						
SURNAME							
DATE							

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-2-

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosure

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

May be fatal if swallowed. May be absorbed through skin. Do not breathe spray mist. Do not get in eyes, on skin, or on clothing. Causes eye and skin irritation. Wash hands, arms, and face thoroughly with soap and water after handling and before eating or smoking. Routinely shower or bathe after working and wash work clothes with soap and hot water before reusing. Do not contaminate food and feedstuffs.

For seed treatment, applicators who apply this product manually or without the use of a closed-system treatment procedure must wear long-sleeved shirt, long pants, gloves, and a disposable paper mask which covers at least one-third of the face. The product must be applied in a well-ventilated area.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds, and other wildlife. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or disposal of wastes.

Exposed treated seed may be hazardous to birds and other wildlife. Dispose of excess treated seed by burial away from bodies of water.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. **STORAGE:** Store in a cool, dry place. Do not allow to freeze or become overheated. Store away from food or feed, in an area designated for pesticides. Store in original container only. Keep container tightly closed when not in use.


PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of a toxic pesticide, spray mixture, or residue 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 Agency, or the Hazardous Waste representative at the nearest Regional Office for guidance.

CONTAINER DISPOSAL (Metal): Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONTAINER DISPOSAL (Plastic): 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.

SEED TREATMENT: Do not use treated seed for food, feed, or oil purposes. Treated seed should be labeled in accord with all the applicable requirements of the Federal Seed Act. The Federal Seed Act requires that seed treated with a pesticide must contain a dye which imparts an unusual color to the seed if the seed is intended to be moved in interstate commerce. Labels attached to treated seed must state, "Treated seed must not be used for food, feed or oil purposes." and "Exposed treated seed may be hazardous to birds and other wildlife. Dispose of excess treated seed by burial away from bodies of water."

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



LINDANE 25 EC SEED TREATER
Agricultural Insecticide Emulsifiable Concentrate

ACTIVE INGREDIENTS:	BY WT.
LINDANE (Gamma Isomer of Benzene Hexachloride)	25.0%
XYLENE	70.1%
INERT INGREDIENTS:	4.9%
CONTAINS 2.0 LBS. LINDANE PER GALLON	100.0%
THIS PRODUCT CONTAINS THE TOXIC INERT INGREDIENT PHOSPHORINE S	

**KEEP OUT OF REACH OF CHILDREN
WARNING**

Statement of Practical Treatment
IF SWALLOWED: Call a physician or Poison Control Center immediately. Gastric lavage is indicated if material was taken internally. Do not induce vomiting. Vomiting may cause aspiration pneumonia.
IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth.
IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.
IF IN EYES: Immediately flush eyes with running water for at least 15 minutes. Call a Physician.

See side panel for additional precautionary statements.

SHAKE WELL BEFORE USING.

EPA Reg. No. 43789-14 EPA Est. _____
 Net Contents _____
 Manufactured for:
AGRICULTURAL PRODUCTS CO., GREELEY, CO 80632

PHO
LINDANE 25 EC S
secticide especially fo
corn maggots, and ce
application through sl
For **EMULSIFIED TREATMENT**,
and approved for the
equipment, with no tag
Thoroughly plug the
amount of water for
seed. Clean equipment
IMPORTANT - Be
COM

- Store in
SEED TR
TYPE OF S
- Alfalfa, Clover
 - Barley
 - Bears
 - Bush Snap and all others
 - Baby Bush Limas
 - Standard and Fordhook L
 - Cabbage, Cauliflower, Brocc
 - Brussel Sprouts, Radish
 - Cantaloupe, Cucumber, Wal
 - Pumpkin
 - Carrots, Onions
 - Corn
 - Cotton
 - Acid Deftined
 - Machine Deftined
 - Fuzzy, Undeinted
 - Flax
 - Grass (Safflower, Rye, Sud
 - Lentils
 - Milo, Sorghum, Okra
 - Lettuce
 - Oats
 - Peas
 - Soybean
 - Sprnach, Sunflower
 - Wheat
- IF SOIL TEMPERATURE IS EXTREME
reduce recommended dosage by 50%
protective fungicide

BEST AVAILABLE COPY