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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAY 25 2000

Ms Annette M. Flores
TCMEN AGRO, Inc.
100 First Street, Suite 1700
San Francisco, CA 94105

Dear Ms. Flores:

Subject: EPA Registration Number 66330-21
Captan Moly Soybean Seed Protectant (2X)
EPA Registration Number 66330-15
Captan 10 Potato and Seed Protectant Fungicide
EPA Registration Number 66330-14
Captan 5 Potato Seed Protectant Fungicide
EPA Registration Number 66330-09
Captan WSP Seed Protectant
Amendment - To comply with PR Notice 91-2
Your submission dated February 14, 2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Change the STATEMENT OF PRACTICAL TREATMENT to read, "FIRST AID".

2. Change the FIRST AID statements to read:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 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.

IF SWALLOWED: Call 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

2/10

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

(The above changes must be made to comply with PR Notice 2000-3 by October 1, 2001.)

3. PRECAUTIONARY STATEMENTS MUST READ:

Corrosive. Causes irreversible eye damage. Harmful if swallowed or inhaled. Harmful if absorbed through skin. Avoid contact with eyes, skin and clothing. Avoid breathing dust. May cause allergic skin reaction.

4. Under PRECAUTIONARY STATEMENTS, PERSONAL PROTECTIVE EQUIPMENT change "Waterproof gloves" to read "Chemical Resistant Gloves (such as polyethylene or polyvinyl chloride)". Also add, "Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart".

5. Under AGRICULTURAL USE REQUIREMENTS change "Waterproof gloves" to read "Chemical Resistant Gloves (such as polyethylene or polyvinyl chloride)".

The new basic formulations are not acceptable. Item 17 on the CSFs has not been entered. In addition the CSF for product 66330-9 must be revised. The amount of the water soluble packaging must be deleted from item 13 and included in the quantity of another inert ingredient (such as: water). The quantity of the inert would be adjusted, so that the total weight is 100 lbs and % by weight adds to 100%. See PR Notice 94-8. These CSFs will be acceptable after you submit new CSFs incorporating this information. Please submit revised CSFs for our files.

Submit one (1) copy of the revised final label for the record before you release the product for shipment.

Sincerely,



Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

*Enclosure:

3/10

CLEAN CROP CAPTAN WSP

SEED PROTECTANT FUNGICIDE IN WATER SOLUBLE PACKET

Contains No Binder
Prevents Seed Rot and Damping-off Diseases
May be Used In Slurry Treaters

DOES NOT CONTAIN DYE

ACTIVE INGREDIENTS:	By Wt.
Captan*.....	61.5%
Related Derivatives.....	1.4%
INERT INGREDIENTS:.....	37.1%
Total:.....	100.00%

* N-Trichloromethylthio-4-cyclohexene-1,2-dicarboximide

EPA Reg. No. 10182-33366330-9
EPA Est. No.

Net Contents:

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

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 Side Panel for Additional Precautionary Statements

Made in U.S.A.
ZENECA Ag Products
ZENECA Inc.
Wilmington, DE 19897
TOMEN AGRO, Inc.
100 First Street, Suite 1610
San Francisco, CA 94105

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

MAY 25 2000

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

66330-9

4/10

STATEMENT OF PRACTICE TREATMENT

IF IN EYES: Immediately flush eyes with fresh water for 15 minutes and get medical attention.

IF SWALLOWED: Contact physician, Poison Control Center, or emergency clinic before inducing vomiting. Give water or milk to drink and induce vomiting by touching back of throat with finger, or by administering syrup of ipecac. Do not induce vomiting or give anything by mouth to an unconscious person. If medical advice cannot be obtained, take person and a copy of the label to the nearest emergency treatment facility.

IF ON SKIN: Wash with plenty of soap and water. See a doctor if irritation occurs or rash develops.

IF INHALED: Remove person from exposure area.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL (800) F-A-S-T-M-E-D (327-8633) 1-800-228-5635 Extension 174.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER

CAUSES IRREVERSIBLE EYE DAMAGE. HARMFUL IF SWALLOWED OR INHALED. MAY CAUSE ALLERGIC SKIN REACTIONS. Do not get in eyes. Avoid contact with skin and clothing. Avoid inhalation of dust.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers (other than mixers and loaders) must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

Mixers and Loaders must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear
- Chemical-resistant apron when mixing or loading
- Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

5/10

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, enclosed cabs, or aircraft 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.
 - Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
 - 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.
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ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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 when disposing of equipment washwaters. In the event that treated seeds are spilled and cannot be salvaged, completely cover them with soil.

NOTE TO USER: Federal Government and most states have seed laws and regulations requiring an appropriate caution statement be affixed to bags containing treated seed such as: **"Treated Seed – Do Not Use For Food or Feed."**

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

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.

Not for use on agricultural establishments in hopper-box, planter-box, slurry-box, or other seed-treatment applications at or immediately before planting.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited. Do not reuse empty container. Do not store under conditions which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking, and penetration of moisture.

STORAGE: Store in a safe manner. Store in original container only. Store in cool dry place. Keep container tightly closed when not in use. Reduce stacking height where local conditions, such as humidity or pallet overhang can affect package strength. Personnel should use clothing and equipment consistent with good pesticide handling.

PESTICIDE DISPOSAL: This product is acutely hazardous. 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 instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

Clean Crop Captan WSP Seed Protectant Fungicide has no adverse effect on seed germination or planting rate when used as directed. It is used in preventing seed rot and damp-off diseases on germinating seeds and seedlings and smut on onion and hulled sorghum seeds.

USE PRECAUTIONS

To comply with 21 CFR Chapter 1, Section 2.5, all seed treated with Clean Crop WSP Seed Protectant Fungicide must be colored to distinguish and prevent subsequent inadvertent use as a food for man or feed for animals.

MIXING DIRECTIONS

Fill the mix tank one-half to two-thirds full with water. After removing from the waterproof bag, place the desired number of 7.5 lbs. CAPTAN WSP SEED PROTECTANT FUNGICIDE water soluble packets into the mix tank, then start the agitator and add the colorant to the mix tank. If other seed protectant products are added to the mix tank they should be added after the CAPTAN WSP SEED PROTECTANT FUNGICIDE and in the following order: Wettable powders, wet or dry flowables, emulsifiable concentrates, soluble powders or liquids, and **always add the binder last!** Bring the mixture volume up to the desired level by adding water. Treat seed by adjusting your seed treatment machine to apply the rates given in the following table.

NOTE: The materials in the mix tank must be agitated continuously during the mixing process.

GLADIOLUS CORMS: For prevention of Bulb Rot – Use at the rate of 1¼ ozs. **Clean Crop Captan WSP Seed Protectant Fungicide** per 1 gal. water (17½ ozs to 10 gals.). Soak corms in mixture for 20 to 30 minutes.

ONION SEED PELLETTING: Use at the rate of 18½ ozs. **Clean Crop Captan WSP Seed Protectant Fungicide** per 1 lb. of seed plus ¼ pt. methyl cellulose 5% solution.

SLURRY TREATMENT: When used in Slurry treaters, do not allow mixtures to stand overnight. Clean out equipment thoroughly between operations.

Binder must be added to the mixing tank at the rate of two (2) quarts of binder per 30 pounds of **Clean Crop Captan WSP Seed Protectant Fungicide**.

The following table gives rate of **Clean Crop Captan WSP Seed Protectant Fungicide** to use on various seeds. Do not use on baby lima beans.

8/10

Seed	Rate	Lbs. Seed Treated/lb. of Product
Clover	6¼ oz./100 lbs	260
Alfalfa	3¾ oz./bu	
Soybeans	2 oz./100 lbs. 1¼ oz./bu	800
Turnip	2¼ oz./100 lbs.	710
Cotton – Acid Delinted	2¼ oz./100 lbs.	710
Cotton – Machine Delinted Fuzzy (not delinted)	3½ oz./100 lbs	460
Blue Grass	6¼ oz./100 lbs.	260
Cabbage, Cauliflower, Radish, Broccoli, Brussels Sprouts	1¼ oz./100 lbs.	1280
Spinach, Eggplant	4¼ oz./100 lbs.	- 360
Sorghum hulled (Kernel Smut)	3½ oz./100 lbs.	460
Peppers	2¼ oz./100 lbs.	710
Cowpeas	2¼ oz./100 lbs. 1½ oz./bu.	710
Rye	2 oz./200 lbs.	800
Sesame	1¼ oz./100 lbs.	1280
Corn – Field	1 – 2 oz./100 lbs 0.5 – 1.0 oz./bu.	800 – 1600
Corn – Sweet	1.6 – 3.2 oz./100 lbs. 0.93 - 10 oz./bu	500 – 1000
Wheat	1½ oz./100lb. ¾ oz./bu	1070
Oats	2¾ oz./100 lbs. ¾ oz./bu	710
Flax	3 oz./100 lbs. 1½ oz/bu	530
Beans (except Baby Limas)	1.6 – 2 oz./100 lbs.	800 - 1000
Peas	1.0 – 1¼ oz./bu	-
Lentils (Washington & Idaho only)	2 oz./100 lbs.	800
Carrot	7 oz./100 lbs.	230
Cucumber Cantaloupe	2¼ oz./100 lbs.	710
Squash, Pumpkin, Watermelon	1½ oz./100 lbs.	1070
Beets, Swiss Chard	9¼ oz./100 lbs.	170
Rutabaga	3½ oz./100 lbs.	460
Sugar Beets	9¼ oz./100 lbs.	170

9/10

IMPORTANT: Do not feed treated seed to animals. Do not use treated seed for human consumption. Seeds treated with Clean Crop Captan WSP Seed Protectant Fungicide, sold or shipped as feed or foodstuffs may be considered adulterated under state and Federal laws. Treated seed must be labeled as follows: "TREATED SEED. DO NOT USE FOR FOOD, FEED OR OIL."

TREATED SEED DISPOSAL: To dispose of out-of-date or otherwise unmarketable seed which has been treated with captan for seed protectant purposes: Broadcast and lightly incorporate seed into field soils using a disc or other suitable implement. If rate of captan contained on the seed is unknown, have seed analyzed by a qualified analytical laboratory to determine. Do not plant seed at a seedling rate which will result in the application of more than 32 pounds of captan per acre per year. Any resulting crop may be destroyed by chemical or mechanical means, or, if useful for food or feed purposes, may be harvested for that use.

~~**NOTICE TO BUYER AND USER:** Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller, and Buyer and User assume the risk of any such use. SELLER DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE.~~

NOTICE TO BUYER AND USER:

CONDITIONS OF SALE:

1. TOMEN AGRO, Inc. warrants that this product conforms to the chemical description on the label and is reasonable fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.
2. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Tomen. TOMEN DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.

10/10

3. Critical and unforeseeable factors beyond Tomen's control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are not limited to, damage to plants and crops to which the product is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated on the label and even though label directions are followed. Except as stated in 1 above, Buyer and User acknowledge and assume all risks and liability resulting from handling, storage, and use of this product.