

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

AUG 1 9 2002

Dr. Shih-Lo Lee Arvesta Corporation 100 First Street, Suite 1700 San Francisco, CA 94105

Dear Dr. Lee:

Subject: Amendment- Delete Alfalfa, Beans, Broccoli, Brussels
Sprouts, Cabbage, Cantaloupes, Carrots,
Cauliflower, Clover, Cotton, Cucumbers,
Flax, Okra, Onions, Peas, Pumpkin, Radishes,
Safflower, Soybeans, Spinach, Squash,
Sudangrass, Sugar Beets, Sunflower, and
Watermelons; and

Update First Aid per PR Notice 2001-1

Isotox Seed Treater (F)
EPA Registration Number 66330-19
Your submission dated May 15, 2002

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable and a stamped copy of the label is enclosed for your records. The Agency assumes that all text crossed out on your current submission will be deleted on the finished labeling. Also, please note that the maximum rate now permitted on Corn is 4 oz. per 100 pounds of seed. Please adjust your rate accordingly. You may wish to delete the note about seed corn maggots since the 8 oz. rate would no longer be available. Please submit 5 copies of the finished label as soon as it becomes available.

Sincerely,

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

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ISOTOX® SEED TREATER (F)

Insecticide-Fungicide With Graphite For Corn Seed, Beans Also Repellent To Pheasants

ACTIVE INGREDIENTS:	By Wt.
Lindane - Gamma Isomer of Benzene Hexachloride	
Captan*	12.2%
Related Derivatives	0.3%
INERT INGREDIENTS:	62.5%
TOTAL	100.0%

^{*}N-Trichloromethylthio-4-cyclohexene-1, 2-dicarboximide.

EPA Reg. No. 10182-311 66330-19 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 detaile. (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 ARVESTA CORPORATION

100 First St., Suite 1700

San Francisco, CA 94105

ACCEPTED
with COMMENTS
the EPA Letter Dated:

AUG 1 9 2002

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STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Immediately flush eyes with fresh water for at least 15 minutes and see a dector.

IF INHALED: Remove person from exposure area.

IF SWALLOWED: Contact physician, poison control center, or emergency clinic before inducing vemiting. Give water or milk to drink and induce vemiting by touching back of throat with finger, or by administering syrup of ipecac. Do not induce vemiting 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: Remove contaminated clothing and wash affected areas with soap and water.

FIRST AID		
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. 	
<u>If inhaled</u>	 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. 	
<u>If swallowed</u>	 Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do no induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. 	
	 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. Ict container or label with you when calling a poison centrol centering for treatment. 	
NOTE TO PHYSICIAN		

Probable mucosal damage may contraindicate the use of gastric lavage.

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

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

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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)

Some materials that are chemical-resistant to this product are polyethylene and polyvinyl chloride. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, and other handlers must wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks,
- Chemical-resistant gloves (except applicators driving motorized equipment),

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- Chemical-resistant apron when mixing or loading.
- Protective eyewear

In addition, a NIOSH approved dust/mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any N², .R, P, or HE filter must be worn by all handlers except (1) applicators driving motorized equipment and (2) mixers/loader/applicators participating in backpack, low-pressure handwand/handgun, and dip treatments.

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.

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/<u>PPE</u> 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, was thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Exposed treated seed may be hazardous to 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. Do not contaminate water when disposing of equipment washwaters or rinsate. Dispose of all excess treated seeds by burial away from bodies of water. In the event that treated seeds are spilled and cannot be salvaged, completely cover them with soil.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICKLY 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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with it's 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 instructions and exceptions pertaining to the statements on this label about personal protection equipment (PPE), notification to workers, 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 4 days.

Exception: For the last 48 hours of the REI, workers may enter the treated area to perform hand labor or other tasks involving contact with anything that has been treated, such as plants, soil or water, without time limit, if they wear the early entry PPE listed below:

Exception: If the product is used for seed treatment, the Worker Protection Standard under certain circumstances, allows workers to enter the treated area if there will not be 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
- Waterproof gloves
- Shoes plus socks
- ---Protective evewear

Notify workers of the application by warning them orally or by posting warning signs at entrances to treated areas.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of:

12 hours for planter box-type or hopper-box seed treatment uses. Exception: Once the seeds are planted in the soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no contact with the soil/media subsurface.

Early Entry PPE

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:

- Coveralis,
- Protective eyewear,
- Chemical-resistant gloves made of any water-proof material
- Shoes plus socks

ISOTOX Seed Treater (F) is a formulation for use in the treatment of seeds for protection against wireworms, seed corn maggots and certain other soil-borne insects, as well as added fungicidal protection at planting time. ALSO REPELLENT TO PHEASANTS. Where Seedling Blight, Damp off or Seed Decay normally occur, combine with a full dosage of protective fungicide.

ISOTOX Seed Treater (F) may be used on corn seed previously treated with a protective fungicide.

APPLY IN PLANTER BOX USING DESIGNATED AMOUNT PER 100 LBS. SEED: MEASURING CUP ENCLOSED – One level cup contains approximately 4 oz. of product.

For improved mixing product with seed, the following procedures are suggested: Fill planter box only half full of seed, add half the required amount of ISOTOX Seed Treater and mix thoroughly with a stick. Then put remainder of seed in planter box and add the rest of the required ISOTOX Seed Treater (F), mixing thoroughly again. Good results are also obtained by premixing with ISOTOX

Seed Treater (F) in a suitable container then pouring treated seed into planter box.

CROP	RATE PER 100 LBS SEED
ALFALFA, CLOVER	[,] 2 oz.
BARLEY	4 oz.
BEANS: (Use with a protective fungicide)	
——Baby Bush Limas	2 oz.
Bush, Snap and all other except Limas	2 oz.
Standard and Fordhook Large Limas	1 oz.
CABBAGE, CAULIFLOWER, BROCCOLI, BRUSSELS SPROUTS, RADISHES	2 oz.
CORN (Treatment for seed corn maggots requires the maximum rate of 8 oz/100 lbs or 4 oz/50 lbs seed)	4 – 8 oz. (2 – 4 oz/50 lbs)
CARROTS, ONIONS	4- 02.
COTTON	8 oz.
CUCUMBERS, CANTALOUPES, WATERMELONS, SQUASH, PUMPKIN	4 oz.
FLAX	2 oz.
OATS	2 oz.
OKRA	4 oz.
PEAS	4 oz.
SAFFLOWER, RYE, SUNDAN GRASS	2 oz.
SPINACH, SUNFLOWER	4- oz.
SORGHUM	<u>4 oz.</u>

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SOYBEAN	2 oz.
SUGER BEETS	16 oz (1 lb)
WHEAT	2 oz.

If soil temperature is extremely high due to low moisture, real hot weather and midsummer planting time, reduce dosage by one-half. TREATED SEEDS MUST NOT BE USED FOR OR MIXED WITH FOOD OR ANIMAL FEED, OR PROCESSED FOR OIL. TREAT ONLY THOSE SEEDS NEEDED FOR IMMEDIATE USE, MINIMIZING THE INTERVAL BETWEEN TREATMENT AND PLANTING. DO NOT STORE EXCESS TREATED SEEDS BEYOND PLANTING TIME.

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 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.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

STORAGE: Keep pesticide in original container. Avoid contamination of feed and foodstuffs. For help with any spill, leak, fire or exposure involving this material, call day or night 1-800-424-9300.

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 instruction, 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). Do not reuse container. 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.

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NOTICE TO BUYER AND USER: Soller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose 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 risk of any such use. SELLER DISCLAIMS ALL OTHER WARRANTIES EXPRESSED OR IMPLIED INCLUDING ANY WARANTY OF FITNESS OR MÉRCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES 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. ARVESTA CORPORATION 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 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 not reasonably foreseeable to Arvesta. ARVESTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESS 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. ARVESTA DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.
- 3. Critical and unforeseeable factors beyond Arvesta'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.