

66330-19

6/12/2003

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Doina Bujor
Project Manager, R&RA
Arvesta Corporation
100 First Street
Suite 1700
San Francisco, CA 94105

JUN 12 2003

Subject: Isotox® Seed Treater (F)
EPA Reg. No. 66330-19
Your amendment dated May 20, 2003

Dear Ms Bujor:

The labeling that you submitted on May 20, 2003 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. List of ingredients: suggest that the subtitle be changed from "INERT INGREDIENTS" to "OTHER INGREDIENTS"
2. Spanish language warning: change "detaile" to "detalle"
3. PERSONAL PROTECTIVE EQUIPMENT:
 - delete the text that is in parentheses in the second paragraph.
 - in the 4th paragraph, delete "(1)" and "(2) mixers/loader/applicators participating in backpack, low-pressure handwand/handgun, and dip treatments."
4. STORAGE AND DISPOSAL: suggest that you change the subheader from "STORAGE" to "PESTICIDE STORAGE"

Please be aware that acceptance of this amendment does not relieve you of the need to satisfy any requirements, including submission of revised labeling, pertinent to your product under the Lindane RED and associated Data Call-In, when issued. Please note that the Lindane RED indicates that all crops except corn and sorghum will have to be deleted from Lindane dust formulations for on-farm seed treatment.

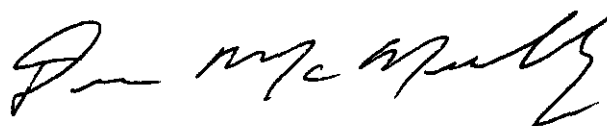
Isotox® Seed Treater (F)
Page 2 of 2

One copy of the label stamped "Accepted with comments" is enclosed for your information.

Please submit one copy of the final printed label before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Dennis McNeilly
Acting Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
JUN 12 2003

ISOTOX® SEED TREATER (F)

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

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

66330-19

ACTIVE INGREDIENTS:	By Wt.
Lindane – Gamma Isomer of Benzene Hexachloride.....	25.0%
Captan*.....	12.2%
Related Derivatives.....	0.3%
INERT INGREDIENTS:	62.5%
TOTAL	100.0%

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

EPA Reg. No. 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 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.

Arvesta Corporation
100 First St., Suite 1700
San Francisco, CA 94105

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • 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 inhaled	<ul style="list-style-type: none"> • 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.

4/8

	<ul style="list-style-type: none">• Call a poison control center or doctor for further treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 on skin or clothing	<ul style="list-style-type: none">• 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN
Probable mucosal damage may contraindicate the use of gastric lavage.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE
CALL 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. Avoid contact with eyes, skin and clothing. Avoid breathing dust. MAY CAUSE ALLERGIC SKIN REACTIONS.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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 (including handlers participating in seeding and transplanting as part of root-dip or greenhouse soil treatments and persons handling/cutting/sorting treated potato seed pieces) must wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks,

- Chemical-resistant gloves (except applicators driving motorized equipment),
- Chemical-resistant apron when participating in dip treatments,
- 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/PPE 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.

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 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

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.

6/8

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, 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:

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:

- Coveralls,
- 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.

7/8

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
BARLEY	2 oz.
CORN	4 oz. (2 oz/50 lbs)
OATS	2 oz.
RYE	2 oz.
SORGHUM	4 oz.
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.

8/8

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.

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 AGENCY 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.