



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 20 1998

Desmond Byrne
Tomen Agro, Inc.
100 First Street, Suite 1610
San Francisco, CA 94105

Dear Mr. Byrne:

Subject: Captan Technical, EPA Registration No. 66330-31
Tomen Captan Technical, EPA Registration No. 66330-32
Technical Captan 90, EPA Registration No. 66330-33
Amended labeling in response to Agency letter 1/16/98
Your letter Dated 2/10/98

The labeling referred to above, submitted in connection with the registrations under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided the following changes are incorporated:

1. First aid statements must appear on the front panel of the label for all products classified as toxicity category I for acute oral, acute dermal, or acute inhalation exposure. However, a referral statement such as "see side/back panel for first aid" must appear on the front panel in close proximity to the signal word if these statements do not appear on the front panel. First aid statements on the side or back panel should be grouped near the other precautionary labeling, yet set apart or distinguishable from the other label text.
2. For EPA Registration No. 66330-33, the proposed name is not acceptable and must be changed. The product name

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is misleading, this product does not contain 90% active ingredient and therefore should not have "90" as part of the name.

A stamped copy of the labels are enclosed for your records. Submit one copy of final printed labeling before you release your products for shipment.

Sincerely,



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

TOMEN CAPTAN TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

THIS PRODUCT IS A FUNGICIDE FOR USE IN FURTHER MANUFACTURE OF
PESTICIDES AND FUNGAL-RESISTANT PAINTS

ACTIVE INGREDIENT:

*CAPTAN.....	88.0%
Related Derivatives.....	2%
INERT INGREDIENTS:.....10.0%	
Total.....	100.0%

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

EPA Reg. No.: 66330-32 Net Contents: 50 lbs.

EPA Est. No.: -

KEEP OUT OF REACH OF CHILDREN

DANGER

CAUSES IRREVERSIBLE EYE DAMAGE

HARMFUL IF INHALED, ABSORBED THROUGH SKIN OR SWALLOWED

MADE IN THE U.S.A.

**TOMEN AGRO, INC.
100 FIRST STREET, SUITE 1610
SAN FRANCISCO, CA 94105**

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

APR 20 1998

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
66330-32**

STATEMENT OF PRACTICAL TREATMENT

FIRST AID

IF IN EYES: -. Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: -. Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF ON SKIN: -. Wash with plenty of soap and water. Get medical attention

IF INHALED: -. Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

**FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
1-800-228-5635 ext. 174
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call
CHEMTREC 1-800-424-9300**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Harmful if swallowed or inhaled. May cause allergic skin reactions. Do not get in eyes or on clothing. Wear goggles or face shield when handling. Avoid breathing dust. Avoid contact with skin and clothing. Remove contaminated clothing and separately wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems, without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is intended for further manufacturing of pesticides only. All formulators are responsible for obtaining EPA registration for their formulated product. For additional information regarding the directions for use for further manufacturing into end-use pesticide products, contact - Tomen Agro, Inc., San Francisco, CA 94105, telephone (415) 536-3480. Only for formulation into a fungicide for the following uses:

1. FOOD USE SITES

Seed Treatments:

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|------------------|---------------------|-------------|
| Alfalfa | Cucumbers | Pumpkins |
| Beans | Eggplant | Radish |
| Beets | Flax | Rape |
| Broccoli | Grasses | Rutabaga |
| Brussels Sprouts | Honeydew | Safflower |
| Cabbage | Kale | Sesame |
| Cantaloupe | Lentils | Shallots |
| Carrots | Lespedeza | Sorghum |
| Cauliflower | Lettuce | Soybeans |
| Cereal Grains | Melons | Spinach |
| --Barley, Rye | Milo | Squash |
| --Oats | Muskmelons | Sugar Beets |
| --Wheat | Mustard Greens | Sunflowers |
| Clover | Okra | Swiss Chard |
| Collards | Onions | Tomato |
| Corn (field) | Peanuts | Taro (Corn) |
| pop. sweet) | Peas | Trefoil |
| Cotton | Peppers | Turnip |
| Cowpea | Potato (Seed Piece) | Watermelon |

Fruit & Nut Crops:

- | | | |
|-------------|---------------------------|--------------|
| Almonds | Grapes | Plums |
| Apples | Nectarines | Fresh Prunes |
| Apricots | Peaches | Raspberries |
| Blueberries | Pears (post harvest only) | Strawberries |
| Cherries | | |

NON-FOOD USE SITES:

Ornamental Plants:

Azaleas	Conifers (ornamental only)	Ornamental Flowering Plants
Begonias	Dichondra	Roses
Camellias	Gladiolus	Soil (lawn seedbeds and Greenhouse Bench)
Carnations	Grasses (in lawns and turfs, non-pasturing areas)	
Chrysanthemums		

Indoor, Industrial Uses:

Paints Plastics Adhesives

- 3. Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- 4. Uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Protect from excessive heat. Do not store or transport near food or feed.

PESTICIDE DISPOSAL: Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide 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: Do not reuse. Completely empty bag into manufacturing equipment. Then 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.

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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 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, or under conditions not reasonably foreseeable to Tomen. **TOMEN 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. TOMEN DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**
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.