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68119-13

09/15/2000



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

SEP 15 2000

WILFARM LLC
c/o Alice Walker Consulting
811 Country Club Dr.
Senatobia, MS 38668

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Delta-Coat AD and Alternate Brand Name, Nu-Flo AD
EPA Reg. No. 68119-13
Your Letter and Application Dated June 6, 2000

Dear Dr. Walker:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following comment on both versions of the letter:

Under Directions For Use, revise the statement "Important: Read the entire..." as follows: "Always read the entire label. Use strictly in accordance with precautionary statements and directions and with all applicable state and federal regulations." The current statement implies that an applicator need only read the directions for use & warranty statement before using the product.

Stamped copies are enclosed for the both versions of the label. Please submit one (1) copy of each version of your final printed labeling before you release the product for shipment. If you have any questions, please contact Summer Gardner- Jenkins of my staff at (703) 308-9353.

Sincerely,

Mary L. Waller
Product Manager 21
Fungicide Branch
Registration Division (7505C)

Enclosure

ACCEPTED
with COMMENTS
In EPA Letter Dated
SEP 15 2000

DELTA-COAT AD

Seed Treatment Fungicide for On-Farm Use

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
Recommended for the pesticide
registered under EPA Reg. No.
68119-13

ACTIVE INGREDIENTS:

- Chloroneb (1,4-dichloro-2,5-dimethoxybenzene).....30.0%
- Metalaxyl (N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester3.5%

- INERT INGREDIENTS:.....66.5%
- TOTAL100.0%

Contains 2.9 lbs. a.i. chloroneb and 0.34 lbs. metalaxyl per gal.

EPA Reg. No. 68119-13

EPA Est. No.: 264 MO-2; 7501-IA-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.
- If swallowed**
 - Call a 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 to mouth-to-mouth, if possible.
 - Call a poison control center or doctor for further treatment advice.
- 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.

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.

See additional precautionary statements and directions for use below.

Manufactured for:
WILFARM L.L.C.
5401 North Oak Trafficway
Gladstone, MO 64118-4627

In case of emergency
call Chemtrec
(800)424-9300

Net Contents
2-1/2 Gals
(9.48 Liters)

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

Harmful if swallowed, or inhaled, or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapors of spray mist.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear: long-sleeved shirt and long pants; chemical-resistant gloves such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride or viton; and shoes plus socks.

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.

ENGINEERING CONTROLS STATEMENTS: 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 Part 170.240(d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

ENVIRONMENTAL HAZARDS

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.

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.

DIRECTIONS FOR USE

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

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.

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Notice before using this product.

Failure to follow directions on this label may result in crop injury or poor disease control.

Do not apply this product through any type of irrigation system.

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 protective equipment (PPE), notification to workers and restricted entry intervals. The requirements in this box apply only 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.

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 be no 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; chemical-resistant gloves such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride or viton; shoes plus socks.

CONDITIONS OF SALE: Delta-Coat AD is a systemic fungicide having a specific mode of action. Delta-Coat AD could be subject to development of resistant strains of fungi. Development of resistance cannot be predicted. Therefore, WILFARM cannot assume liability for crop damage resulting from resistant strains of fungi. Consult with your State Agricultural Experiment Station or Extension Service Specialist for guidance and ways to control any possible Delta-Coat AD resistant strains of fungi which may occur.

Use the high rate when conditions for disease expression are favorable.

BEANS (String beans, black-eyed peas, cowpeas, field beans, green beans, kidney beans, lima beans, navy beans, pinto beans, pole beans, snap beans, wax beans, and lupine): For Pythium and Rhizoctonia damping-off, apply Delta-Coat AD as a seed treatment at the rate of 5.5 to 7.0 fl. ounces per 100 pounds of seed.

COTTON: For Pythium and Rhizoctonia seed rot and damping-off of acid or machine delinted cotton seed, apply Delta-Coat AD as a seed treatment at the rate of 11.75 fl. ounces per 100 pounds of seed.

SOYBEANS: For early season Phytophthora control and Pythium and Rhizoctonia damping-off, apply Delta Coat AD as a seed treatment at the rate of 5.5 to 7.0 fl. ounces per 100 pounds of seed.

Do not use excess seed for food, feed or oil purposes.

In California, do not graze plants grown from treated seed. In other areas, do not graze beans or soybeans within 45 days of planting.

Planter Box Application:

- 1. Pour one bushel of seed into each planter box.

2. Pour enough Delta-Coat AD on top of the seed to treat one bushel.
3. Mix thoroughly with an axe handle or paddle (an axe handle or paddle used for seed treatment purposes only) until seed is uniformly coated.

Drill Box Application:

1. Fill drill one-half full, counting the number of bags (bushels) put into the drill.
2. Pour 4 fluid ounces of Delta-Coat AD on top of each bushel of seed just put into the drill.
3. Mix thoroughly with an axe handle or paddle (an axe handle or paddle used for seed treatment purposes only) until seeds are uniformly covered.
4. Fill the remainder of the drill and repeat the process in items 2 and 3.

Vacuum Planters:

Pour 50 pounds of seed into the planter box. Pour enough Delta-Coat AD on top of the seed to treat 50 pounds of seed. Mix thoroughly with an axe handle or paddle until seed is uniformly covered. Then add any plantability additive at the recommended rate to improve seed flowability (talc, etc.). Mix thoroughly once more with an axe handle or paddle to get uniform coverage. This process will provide best seed flow through the planter while providing all the benefits of a seed treatment product.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Pesticide wastes are 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 instructions, 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). 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.

STORAGE: Store in original container only and keep sealed. Store in closed storage areas. Use caution when moving, opening, closing or pouring.

NOTICE -READ CAREFULLY

CONDITIONS OF SALE AND LIMITED WARRANTY STATEMENT

The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILFARM L.L.C. does not make, nor does it authorize any agent or representative to make, any warranty, guaranty or representation, expressed or implied, concerning this material or the use thereof, except in conformity with the statements on the label. Neither WILFARM L.L.C. nor the seller shall be held responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on these conditions.

Treatment of highly mechanically damaged seed or seed of known low vigor and poor quality except for the purposes of curative control of existing disease or insect pests may result in reduced germination and/or reduced vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of WILFARM L.L.C., no claims are made to guarantee germination of carry-over seed.

6/8

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 15 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
68119-13

NU-FLOW AD

Seed Treatment Fungicide

ACTIVE INGREDIENTS:

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 - Call a 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 to mouth-to-mouth, if possible.
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- If on skin or clothing**
 - Take off contaminated clothing.
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CAUTION**

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ENVIRONMENTAL HAZARDS

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.

DIRECTIONS FOR USE

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

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

IMPORTANT: Read the entire Directions for Use and the Conditions of Sale and Notice before using this product.

Failure to follow directions on this label may result in crop injury or poor disease control.

Do not apply this product through any type of irrigation system.

In California, apply only with closed system equipment.

CONDITIONS OF SALE: Nu-Flow AD is a systemic fungicide having a specific mode of action. Nu-Flow AD could be subject to development of resistant strains of fungi. Development of resistance cannot be predicted. Therefore, WILFARM cannot assume liability for crop damage resulting from resistant strains of fungi. Consult with your State Agricultural Experiment Station or Extension Service Specialist for guidance and ways to control any possible Nu-Flow AD resistant strains of fungi which may occur.

COMMERCIAL TREATMENT

NuFlow AD may be applied as a water-based slurry with other registered seed treatment insecticides and fungicides through standard slurry or mist-type commercial seed treatment equipment.

NOTE: Federal law requires that bags containing treated seed shall be labeled with the following information: "This seed has been treated with Nu-Flow AD fungicide. Do not use excess treated seed for food, feed or oil purposes."

In California, do not graze plants grown from treated seed. In other areas, do not graze bears or soybeans within 45 days of planting.

Store away from feeds and foodstuffs.

Always use Nu-Flow AD with an EPA-approved dye or colorant that imparts an unnatural color to the seed.

Use the high rate when conditions for disease expression are favorable.

BEANS (String beans, black-eyed peas, cowpeas, field beans, green beans, kidney beans, lima beans, navy beans, pinto beans, pole beans, snap beans, wax beans, and lupine): For Pythium and Rhizoctonia damping-off, apply Nu-Flow AD as a seed treatment at the rate of 5.5 to 7.0 fl. ounces per 100 pounds of seed.

COTTON: For Pythium and Rhizoctonia seed rot and damping-off of acid or machine delinted cotton seed, apply Nu-Flow AD as a seed treatment at the rate of 11.75 fl. ounces per 100 pounds of seed.

SOYBEANS: For early season Phytophthora control and Pythium and Rhizoctonia damping-off, apply Nu-Flow AD as a seed treatment at the rate of 5.5 to 7.0 fl. ounces per 100 pounds of seed.

SUGAR BEETS: For Pythium, and Rhizoctonia seed rot and damping-off, apply Nu-Flow AD at the rate of 10.75 fl. ounces per 100 pounds of seed.

Do not use excess seed for food, feed or oil purposes.

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Pesticide wastes are 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 instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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