DATE: June 9, 1980

SUBJECT: EPA Registration Number: 239-2382
Orthocide Soil Treat 8 "X" : Caswell # [7]

FROM: Deloris F. Graham P9E 6/25/80
FHB/TSS E 6/27/80

TO: Henry Jacoby
Product Manager (21)

Applicant: Chevron Chemical Company
Ortho Agricultural Chemicals Division
940 Hensley Street
Richmond, CA  94804

Active Ingredients:
*Captan . . . . . . . . . . 9.5%
Related derivatives . . . . . 0.5%
Penachloronitrobenzene . . 10.0%

Inert Ingredients . . . . . .80.0%
*N-[(trichloromethyl)thio]-4-cyclohexene-1,2-dicarboximide

Background:
A draft label, discussion sheet, human safety data, an offer to
letters of authorization were submitted. Eye Irritation Study
conducted by Chevron was also submitted. "Cite-All" method of
support was used. This data is under Accession number 241922.

Recommendation:

1) Based on the Eye Irritation Study, FHB/TSS agrees that the
signal word, "CAUTION", must be upgraded to the signal
word "DANGER",

2) For future submissions, in the Eye Irritation Study
9 rabbits, 6 rabbits with treated unwashed eyes and
3 rabbits with treated washed eyes; must be used. Also,
corneal irritation scores must be reported with severity and
area scores separately listed. In the case of solids, the
correct dosage for the eye irritation test is 100mg.

Label:

1) The appropriate signal word is "DANGER."
2) The statement "Avoid contamination of feed or foodstuff. Do not apply . . . . . . . . feed or animals" must appear under the heading "Directions For Use."

Review:

1) Eye-Irritation Study: Chevron Chemical Company; February 12, 1980.

Procedure:

One-tenth milliliter (average weight 39mg.) of the solid test material was placed in the conjunctival sac of one eye in each of six New Zealand white male rabbits. Observations were made at 1, 24, 48 and 72 hours and at 7, 9 and 14 days.

Results:

At day 1, 6/6 animals had corneal opacity (1/6=1, 2/6=2, 3/6=3); iris irritation (6/6=1) and conjunctival redness (6/6=3); discharge (6/6=3); chemosis (5/6=3, 1/6=4). Corneal opacity and conjunctival redness and discharge persisted through day 7. Other symptoms included pannus in one animal on day 7.

Study-Classification:

Core Minimum Data. 9 rabbits, 6 rabbits with treated unwashed eyes and 3 rabbits with treated washed eyes. Also, corneal irritation scores must be reported with severity and area scores separately listed. In the case of solids, the correct dosage for the eye irritation test is 100mg.

Toxicity Category:

I - DANGER
**Ortho Orthocide® Soil Treater “X”**

**Fungicide**

**Active Ingredients**
- Cupron
- Related Derivatives
- Phenyl chloroacetamides
- Inert Ingredients

**Storage & Disposal**
- Keep out of reach of children.
- Store in a cool, dry place.
- Protective from excessive spray exposure.

**Precautionary Statements**
- To Humans & Domestic Animals
- If exposure occurs, seek immediate medical attention.
- In case of eye contact, flush with water.
- In case of ingestion, do not induce vomiting.
- Do not store containers in direct sunlight.

**Storage & Disposal**
- Keep out of reach of children.
- Store in a cool, dry place.
- Protective from excessive spray exposure.

**Label Statements**
- This product is toxic to fish. Keep out of lakes, streams, or ponds. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning equipment or disposal of wastes.

**Directions for Use**
- Apply to soil at planting time or as directed.
- Apply at a rate of 1 to 2 oz. per 100 square feet of soil.
- Do not apply with irrigation equipment, and do not apply to wet soil.

**Statement of Practical Treatment**
- In case of eye contact, flush with water for 15 minutes and get medical attention.

**Note to Physicians**
- Emergency Information - call (415) 233-3737.
- Avoid contamination of feed or foodstuffs.

**Conditions of Sale**
- Chevron Chemical Company warrants that this material conforms to the chemical description on the label and is reasonably fit for use as directed herein.
- Chevron neither makes, nor disclaims any warranty of merchantability, fitness for a particular purpose, or represents that the use of this material will conform to any federal, state, or local regulations or standards for the use of the chemicals.

**Temporal Hazards**
- Product is toxic to fish. Keep out of lakes, streams, or ponds. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning equipment or disposal of wastes.

**Operational Hazards**
- A violation of Federal law to use this product under conditions inconsistent with its labeling.

**Entire Label, Use Strictly in Accordance with Precautionary Statements and Directions, and with State and Federal Regulations.**

**Net Weight**
- Chevron Chemical Company
- Orito Agricultural Chemicals Division
- San Francisco, CA 94119
- Product 2320
- Made in USA
- Form 7029 G
- EPA Reg. 239-CA-5

**Orthocide Soil Treater “X”** is a combination fungicide product to be incorporated into the soil for the control of soil-borne diseases as indicated on the label. Orthocide is formulated with an adjuvant that is toxic to fish. Orthocide is intended for use in dry form or shrub beds for the control of soil-borne diseases as indicated on the label. Orthocide is formulated with an adjuvant that is toxic to fish. Orthocide is intended for use in dry form or shrub beds for the control of soil-borne diseases as indicated on the label.