DATE: September 10, 1981

SUBJECT: EPA Registration Number: 239-2457
ORTH Soybean Seed Protectant (MO) 2X

FROM: Deloris F. Graham
FHB/TSS

TO: Henry Jacoby
Product Manager (21)

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

Active Ingredient:
- Captan . . . . . . . . . . . . . . . . . . . . . . . . . . . . 47.3%
- Related derivatives . . . . . . . . . . . . . . . . . . . . . 2.7%
- Inert Ingredient . . . . . . . . . . . . . . . . . . . . . . 50.0%

Background: Submitted Eye Irritation Study to support change in signal word from CAUTION to DANGER. Data under accession number 245629. Study conducted by Chevron. Cite-all method of support.

Recommendation:

1) Based on the Eye Irritation Study, the appropriate signal word is DANGER.

2) Based on the new criteria for evaluating the Eye Study, if corneal opacity and conjunctive irritation has reversed itself in 21 days or less, the appropriate signal word is WARNING, since only 14 days were reported that determination could not be made.

3) For future submissions in the Eye Irritation Study, 9 animals (6 with treated unwashed eyes and 3 with washed eyes) must be used and observations made for 21 days.

Label:

1) The appropriate signal word is DANGER.

2) The statement "Do not feed treated seed to animals. Do not use treated seed for human consumption" must be deleted from Precautionary Statements and placed under Directions For Use.

3) The statement "Seeds treated with ORTHO Soybean Seed Protectant (MO) 24 sold or shipped as feed on foodstuffs may be considered adulterated under state and federal laws. Treated seed must be labeled as follows: "TREATED SEED. DO NOT USE FOR FOOD, FEED OR OIL." This statement must be deleted from Precautionary Statements and placed under Directions For Use.
4) The statement of practical treatment must be revised similar to the following:

In case of eye contact, immediately flush eyes with fresh water for 15 minutes and see a doctor. If swallowed, give a large amount of water to drink, make person vomit by placing finger in back of throat, and call a doctor. Never give anything by mouth to an unconscious person. For skin contact, wash with plenty of soap and water. See a doctor if irritation occurs or rash develops.

Note to Physician: Emergency Information - Call (415) 233-3737.

5) The statement "Keep out of lakes, streams or ponds" must be revised to read "Do not apply directly to lakes, streams or ponds."

Review:

1) Eye Irritation Study: Chevron; Socal 1078/30:84; September 14, 1977.

Procedure: 6 New Zealand white rabbits received a 0.1 ml of test material in one eye each. Observations made at 1 hour, 1,2,3,7,10 and 14 days.

Results: At day 1, 5/6 animals had corneal opacity (5/6 = 5); 5/6 had iris irritation (5/6 = 5); could not score one animal for iris irritation due to corneal opacity and/or chemosis; 6/6 had conjunctive redness (6/6 = 3), chemosis (6/6 = 3) and discharge (3/6 = 2, 3/6 = 3). At day 7, 6/6 corneal opacity (3/6 = 10, 1/6 = 15, 2/6 = 20); 5/6 iris irritation (5/6 = 5); 6/6 conjunctive redness (6/6 = 3), chemosis (4/6 = 1, 2/6 = 2), and discharge (1/6 = 1, 5/6 = 2). At day 10, 6/6 had corneal opacity (2/6 = 15, 4/6 = 20), 2/6 iris irritation (2/6 = 1); 6/6 conjunctive redness (6/6 = 3), chemosis (6/6 = 1); and discharge (6/6 = 2). At day 14, 6/6 had corneal opacity (4/6 = 15, 2/6 = 20); 6/6 conjunctive redness (6/6 = 3), chemosis (5/6 = 1, 1/6 = 2), and discharge (6/6 = 3).

Study Classification: Core Minimum Data. Nine animals (6 with unwashed treated eyes and 3 with washed eyes) must be used and observations made for 21 days.

Toxicity Category: I-DANGER
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER

Corrosive to eyes. Causes eye damage. May cause allergic skin reactions. Harmful if swallowed or inhaled. Do not get in eyes. Wear goggles when handling. Avoid contact with skin and clothing. Avoid breathing of dust or vapor. If conditions or frequency of use increase the potential of exposure, inhalation can best be avoided by wearing a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR, Part 11. Wash hands after use. Remove and launder clothing before reuse. Do not feed treated seed to animals. Do not use treated seed for human consumption. Seeds treated with ORTHO Soybean Seed Protectant(20X) sold or shipped as feed or foodstuffs may be considered adulterated under state and federal laws. Treated seed must be labeled as follows: "TREATED SEED. DO NOT USE FOR FOOD, FEED OR OIL."

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact, immediately flush eyes with fresh water for 15 minutes and see a doctor. If swallowed, give a large amount of water to drink, make person vomit, and call a doctor. For skin contact, wash with plenty of soap and water. See a doctor if irritation occurs or rash develops.

Note to Physicians: Emergency Information - call (415) 233-3737.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams or ponds. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated.

COPY B

Keep Out of Reach of Children

DANGER

See Side Panel for Additional Precautionary statements.
PROHIBITIONS

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment.
Open dumping is prohibited.
Do not reuse empty container.

STORAGE

Keep pesticide in original container.
Store in cool, dry place.
Protect from excessive heat.
Do not store or transport near feed or food.

PESTICIDE DISPOSAL

Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to federal, state or local procedures under the Resource Conservation and Recovery Act.

CONTAINER DISPOSAL

Triple rinse (or equivalent) and offer for recycling or reconditioning, or dispose of in a sanitary landfill or by incineration if permitted by state and local authorities.