



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 9, 2021

Jordan Moseley
Regulatory Manager
Syngenta Crop Protection, LLC
PO Box 18300
Greensboro, NC 27419

Subject: Registration Review Label Mitigation for Cyromazine
Product Name: Trigard OMC
EPA Registration Number: 100-790
Application Dates: August 6th, 2015
Decision Numbers: 571455

Dear Jordan Moseley:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Cyromazine Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

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If you have any questions about this letter, please contact Darius Stanton by phone at 703-437-0433, or via email at stanton.darius@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Linda Arrington', with a stylized flourish at the end.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

(Master Label)

CYROMAZINE | GROUP 17 | INSECTICIDE

Trigard® OMC

Insecticide

A seed treatment chemical for onion maggot control in bulb onions

For use by licensed commercial seed treatment companies only.

Active Ingredient:

Cyromazine*..... 75.0%

Other Ingredients:..... 25.0%

Total:..... 100.0%

*(CAS No. 66215-27-8)

Trigard OMC is a wettable powder containing 0.75 lb cyromazine per pound.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

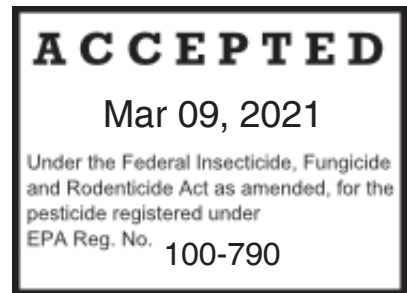
See additional precautionary statements on label.

EPA Reg. No. 100-790

EPA Est.

15 pounds

Net Weight



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 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.
If swallowed	<ul style="list-style-type: none">• 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 a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
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.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Causes moderate eye irritation. Harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves

- Shoes plus socks

User Safety Requirements

Follow the 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.

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

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Apply only as specified on this label. Do not contaminate water when disposing of equipment washwater or rinsate.

Groundwater Advisory

A degradate of Cyromazine is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow. Irrigation could increase the risk of contamination.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, LLC or Seller. To the extent permitted by applicable law, Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of the product contrary to label instructions, or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and (2) Buyer and User assume the risk of any such use. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.**

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

DIRECTIONS FOR USE

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

Do not use on agricultural establishments in hopper-box, planter-box, slurry-box, or other seed-treatment applications at or immediately before planting. Trigard OMC is for use only by licensed commercial seed treatment companies.

Treatment of highly scarred or damaged seed or seed known to be of low vigor and poor quality or seed with inherent sensitivity to cyromazine may result in reduced germination and/or reduction of seed and seedling vigor. Conduct germination tests on a small portion of seed before committing the total seed lot to a selected seed treatment. Treat using equipment similar to that planned for treating the total seed lot. Due to seed quality and seed storage conditions beyond the control of Syngenta, no claims are made to guarantee the germination of carry-over onion seed.

Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds that are spilled during loading and in areas such as row ends.

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY AND/OR POOR INSECT CONTROL.

RESISTANCE MANAGEMENT

CYROMAZINE	GROUP	17	INSECTICIDE
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Trigard OMC contains cyromazine, a Group 17 insecticide. Cyromazine belongs to the cyromazine class of chemistry which disrupts dipteran molting. This mode of action is incompletely defined.

Insect populations may contain individuals naturally resistant to Group 17 insecticides and if used repeatedly in the same fields, then resistant members may eventually dominate the population. Because resistance development cannot be predicted, use sound resistance management strategies established for the crop and use area.

Base seed treatment on an integrated pest management program that includes field sanitation, historical information related to pesticide use, careful selection of pest-tolerant crop varieties, scouting, and management practices which optimize populations of natural enemies of insect pests such as within-field refugia (untreated areas). Sound management programs also consider cultural and biological control practices.

In order to maintain susceptibility to this class of chemistry:

- Use products at their full, recommended doses.

- Use appropriate, well-maintained equipment. Use recommended water volumes and apply at optimal temperatures in order to obtain optimal treatment.
- When rate ranges are given, use the higher rate within the listed rate range when insect pressure is expected to be high.
- Avoid using a single active ingredient or mode of action (same insecticide group) exclusively for season long control of insect species with more than one generation per crop season.
- For insect species with successive or overlapping generations, use a treatment window approach. A treatment window is a period of time defined by the stage of crop development and the biology of the pests of concern. Within the treatment window, depending on the length of residual activity, single or consecutive applications may be made using seed, in-furrow, or foliar treatments unless otherwise excluded by product labels. Do not exceed the maximum amount of this insecticide's mode of action allowed per growing season.
- Following a treatment window of this insecticide's mode of action, rotate to a treatment window of effective products with a different mode of action before making additional applications of this insecticide.

If resistance to this product develops in your area, this product or other products with a similar mode of action may not provide adequate control. If poor performance cannot be attributed to improper application or weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for the crop and use area.

Syngenta encourages responsible product stewardship to ensure effective long term control of the insect pests on this label.

For additional information on Insect Resistance Management:

- Contact Syngenta representatives at 1-800-334-9481
- Contact your local Cooperative Extension Service specialist, pest control advisor, or certified crop advisor
- Visit the Insecticide Resistance Action Committee (IRAC) on the web at: <http://www.irac-online.org>

MIXING PROCEDURES

Thoroughly clean equipment before using this product. Utilize standard seed treatment equipment designed to apply wettable powders to seed and provide uniform seed coverage. Uneven or incomplete seed coverage may not give the desired level of insect control. Use an EPA-approved dye or colorant that imparts an unnatural color to the seed as stated in 40 CFR 153.155(c).

ROTATIONAL CROPS

The following plant-back intervals must be observed when planting rotational crops after planting seed treated with Trigard OMC.

Rotational Crop	Plant-back Interval: Time From Planting of Treated Seed
Bean (<i>Lupinus</i> spp., <i>Phaseolus</i> spp., Broad bean, Garbanzo bean, Jackbean, Lablab bean and Sword bean), Brassica (Cole) Leafy Vegetables Crop Group 5, Bulb Vegetable Crop Group 3, Cucurbit Vegetables Crop Group 9, Leafy Vegetables Crop Group 4, Pepper, Potato, and Tomato	0 days
Sweet corn, Cotton, and Radish	30 days
Any Other Crop	300 days

SEED CONTAINER LABEL REQUIREMENTS

The Federal Seed Act requires that containers of treated seeds be labeled with the following statements:

- This seed has been treated with cyromazine insect growth regulator.
- Do not use for feed, food, or oil purposes.

In addition, the U.S. Environmental Protection Agency requires the following statements on containers of seeds treated with Trigard OMC:

- Store away from feeds and foodstuffs.
- Do not allow children, pets, or livestock to have access to treated seed.
- Groundwater Advisory: A degradate of Cyromazine is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.
- Wear long-sleeved shirt, long pants and chemical-resistant gloves when handling treated seed.
- Treated seed must be planted into the soil at a depth of at least ¼ inch.
- Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds that are spilled during loading and in areas such as row ends.

- Dispose of all excess treated seed. Leftover treated seed may be double-sown around the headland or buried away from water sources in accordance with local requirements.
- Do not contaminate water bodies when disposing of planting equipment washwaters.
- Excess treated seed may be used for ethanol production only if (1) by-products are not used for livestock feed, and (2) no measurable residues of pesticide remain in the ethanol by-products that are used in agronomic practice.

BULB ONIONS

Trigard OMC is a 75% wettable powder which, when applied to seed according to the following directions for use, will control onion maggots on bulb vegetables. Apply Trigard OMC to seed at the rate of 6.6 lb of product per 100 lb of seed (4.95 lb cyromazine per 100 lb of seed).

Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds that are spilled during loading and in areas such as row ends. Dispose of all excess treated seed and seed packaging by burial away from bodies of water.

Use Restrictions

- Do not apply concurrent applications at planting time of insecticide products which have activity against onion maggot.
- Do not harvest bulb vegetables grown from seed treated with Trigard OMC within 60 days of planting.

STORAGE AND DISPOSAL

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

Pesticide Storage and Disposal

Store in a cool, dry place. Do not use in animal feeds. Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Pesticide Disposal

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 Handling [less than or equal to 50 pounds]

Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Container Handling [bags]

Non-refillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Container Handling [fiber drums with liners]

Non-refillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer for recycling if available or dispose of liner in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities. If drum is contaminated and cannot be reused, dispose of it in a manner required by its liner.

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes.

CONTAINER IS NOT SAFE FOR FOOD, FEED, OR DRINKING WATER.

Trigard® OMC, the ALLIANCE FRAME
the SYNGENTA Logo and the PURPOSE ICON
are Trademarks of a Syngenta Group Company

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For non-emergency (e.g., current product information) call
Syngenta Crop Protection at 1-800-334-9481.

Manufactured for:
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Greensboro, North Carolina 27419-8300

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