



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

July 19, 2019

Ricky Kyaw  
Regulatory Product Manager  
Syngenta CropScience LLC  
P.O. Box 18300  
Greensboro, NC 27419

Subject: Registration Review Label Mitigation for Fludioxonil and Mefenoxam  
Product Name: Apron MAXX® RFC  
EPA Registration Number: 100-1195  
Application Date: 7/31/2018; 2/1/2019  
Decision Number: 552855; 552856

Dear Ricky Kyaw

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Fludioxonil and Mefenoxam 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.

If you have any questions about this letter, please contact Darius Stanton by phone at 703-347-0433, or via email at [last.first@epa.gov](mailto:last.first@epa.gov).

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Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

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

Enclosure

(MASTER)

<b>MEFENOXAM</b>	<b>GROUP</b>	<b>4</b>	<b>FUNGICIDE</b>
<b>FLUDIOXONIL</b>	<b>GROUP</b>	<b>12</b>	<b>FUNGICIDE</b>

**ApronMAXX® RFC**

**Fungicide**

Broad-spectrum seed treatment fungicide for protection against seed and seed-borne diseases.

Active Ingredients:

Fludioxonil:*	2.31%
Mefenoxam**:	3.46%
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Other Ingredients:	94.23%
Total:	100.00%

\*CAS No. 131341-86-1

\*\*CAS Nos. 70630-17-0 and 69516-34-3

Contains 0.21 pound active ingredient of fludioxonil and 0.31 pound active ingredient of mefenoxam per gallon.

**KEEP OUT OF REACH OF CHILDREN.**

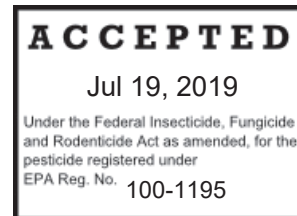
**CAUTION**

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-1195

SCP 1195

\_\_\_\_\_gallons  
Net Contents



<b>FIRST AID</b>	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>HOT LINE NUMBER</b> For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call <b>1-800-888-8372</b>	

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## **PRECAUTIONARY STATEMENTS**

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### **Hazards to Humans and Domestic Animals**

#### **CAUTION**

Harmful if absorbed through the skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### **Personal Protective Equipment (PPE)**

#### **Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, butyl rubber  $\geq$  14 mils, nitrile rubber  $\geq$  14 mils, neoprene rubber  $\geq$  14 mils, or polyvinyl chloride (PVC)  $\geq$  14 mils or Viton®  $\geq$  14 mils
- Shoes plus socks

Follow 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.

## **Engineering Control Statements**

When handlers use closed systems in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

### **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**

This pesticide is toxic to freshwater and estuarine/marine fish and aquatic invertebrates. Do not contaminate water when disposing of equipment washwater or rinsate.

### **Groundwater Advisory Statement**

Mefenoxam is known to leach through soil into groundwater under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

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## CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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**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 consistent with 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 consistent with 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 CONSISTENT WITH 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 consistent with 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 CONSISTENT WITH 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 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.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination test 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 Syngenta crop protection, no claims are made to guarantee germination of carry-over seed.

**Maximum usage when applying metalaxyl- and mefenoxam- containing products to the same crop within the same season:** Do not apply more than the maximum yearly total application rate for the active ingredient as stated on the label of the product containing the lowest yearly total on that crop.

### 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, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply 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 48 hours.** Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, 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 made of barrier laminate, butyl rubber  $\geq$  14 mils, nitrile rubber  $\geq$  14 mils, neoprene rubber  $\geq$  14 mils, or polyvinyl chloride (PVC)  $\geq$  14 mils or Viton®  $\geq$  14 mils
- Shoes plus socks

**FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR DISEASE CONTROL, OR ILLEGAL RESIDUES.**

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**GENERAL INFORMATION**

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ApronMAXX RFC is a seed treatment fungicide that protects against damping-off and seed rots due to *Pythium*, *Phytophthora*, *Fusarium*, *Rhizoctonia* spp., and early season *Phytophthora* root rot. ApronMAXX RFC also suppresses seed-borne *Sclerotinia* and *Phomopsis* spp., particularly in soybeans. ApronMAXX RFC contains the active ingredient mefenoxam found in Apron XL® that provides protection against *Pythium* and early season *Phytophthora* root rot. ApronMAXX RFC also contains the active ingredient fludioxonil found in Maxim® that provides protection against the remaining diseases mentioned in this label.

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**Resistance Management**

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<b>MEFENOXAM</b>	<b>GROUP</b>	<b>4</b>	<b>FUNGICIDE</b>
<b>FLUDIOXONIL</b>	<b>GROUP</b>	<b>12</b>	<b>FUNGICIDE</b>

For resistance management, please note that Apron MAXX RFC contains Group 4/ mefenoxam and Group 12/fludioxonil fungicides. Any fungal population may contain individuals naturally resistant to Apron MAXX RFC and other Group 4 or Group 12 fungicides. A gradual or total loss of pest control may occur over time if these fungicides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

Mefenoxam belongs to the phenylamide class of chemistry which interferes with fungal RNA synthesis. Fludioxonil belongs to the phenylpyrrole class of chemistry which interferes with osmotic signal transduction.

To delay fungicide resistance, take one or more of the following steps:

- Rotate the use of Apron MAXX RFC or other Group 4 or Group 12 fungicides within a growing season sequence with different groups that control the same pathogens.
- Use tank mixtures with fungicide from a different group that are equally effective on the target pest when such use is permitted. Use at least the minimum application rate as labeled by the manufacturer.
- Adopt an integrated disease management program for fungicide use that includes scouting, uses historical information related to pesticide use, and crop rotation, and which considers host plant resistance, impact of environmental conditions on disease development, disease thresholds, as well as cultural, biological and other chemical control practices.
- Where possible, make use of predictive disease models to effectively time fungicide applications. Note that using predictive models alone is not sufficient to manage resistance.
- Monitor treated fungal populations for resistance development.



- Contact your local extension specialist or certified crop advisor for any additional pesticide resistance-management and/or IPM recommendations for specific crop and pathogens.
- For further information or to report suspected resistance contact Syngenta at 1-866-Syngent(a) (866-796-4368). You can also contact your pesticide distributor or university extension specialist to report resistance.

Make all applications according to the use directions that follow. If a rate range is specified, use higher rates of ApronMAXX RFC when the disease pressure is expected to be high.

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## MIXING INSTRUCTIONS FOR SOYBEANS

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ApronMAXX RFC is especially formulated for on-farm or commercial treatment to be used with liquid rhizobia products, using standard mechanical slurry or mist-type seed treatment equipment which accurately measures and mixes a flowable seed treatment. The equipment must provide uniform coverage of ApronMAXX RFC on the seed. Uneven seed coverage may not give the desired level of disease control. ApronMAXX RFC must be diluted with either water or liquid inoculants prior to application to soybeans. Consult the manufacturer of the application equipment you plan to use for suitability for this application and for instructions on operation and calibration of the equipment. Do not mix ApronMAXX RFC fungicide with other pesticides unless sufficient compatibility, loading rates, and seed and crop safety factors are determined. Do not mix with any product that contains a prohibition on mixing. Follow the more restrictive labeling of any tank-mix partner.

In a clean container large enough to contain the entire mixture add the desired amount of ApronMAXX RFC. Add half of the required water or liquid inoculant and mix thoroughly. Add the remaining amount of water or liquid inoculant and mix again. The slurry is ready for application to the soybeans. Mix as needed and do not store diluted mixture.

Additional or continuous agitation or mixing of the slurry mixture may be necessary to prevent the ApronMAXX RFC from settling out of solution when using water or liquid inoculants.

ApronMAXX RFC has been found to be compatible with some liquid inoculant products. ApronMAXX RFC may be mixed or applied sequentially with approved liquid inoculants. Consult the maker of the liquid inoculants and a Syngenta Crop Protection representative for directions before applying ApronMAXX RFC with liquid inoculants.

**Special Precaution:** ApronMAXX RFC is specially formulated to be compatible with some liquid inoculants. **If water is used to further dilute ApronMAXX RFC when rhizobia are present, use only nonchlorinated water. Chlorinated water will kill the live rhizobia contained in the inoculant.**

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**MIXING INSTRUCTIONS FOR OTHER LEGUMES**

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Apply ApronMAXX RFC as a water based slurry utilizing standard slurry seed treatment equipment which provides uniform seed coverage. Uneven or incomplete seed coverage may not give the desired level of disease protection. Thoroughly mix the labeled amount of ApronMAXX RFC into the required amount of water for the slurry treater and dilution rate to be used.

Follow the manufacturer application instructions for the seed treatment equipment being used. Maintain constant agitation of the slurry during the treatment. Allow seed to dry before bagging.

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**CROP USE DIRECTIONS**

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**Note:** Federal law requires that bags of treated seeds shall be labeled with the following information: “This seed has been treated with fludioxonil and mefenoxam fungicides. Do not use for food, feed or oil purposes. Store away from food and feedstuffs.” Treated seed bagged for later use must contain an EPA-approved dye or colorant that imparts an unnatural color to the seed.

**Soybean**

ApronMAXX RFC provides protection against damping-off and seed rots due to *Pythium*, *Phytophthora*, *Fusarium*, *Rhizoctonia* spp., and early season *Phytophthora* root rot. ApronMAXX RFC also suppresses seed-borne *Sclerotinia* and *Phomopsis* spp. For these soybean diseases, apply ApronMAXX RFC at the rate specified in the rate table, plus water at 3.5 fl oz per 100 lbs. seed. Alternatively, approved liquid rhizobia inoculants at rates specified by manufacturer to achieve proper total slurry volumes can be used. If the target fields have a history of high *Phytophthora* pressure, then use Apron XL as specified in the rate table. Read and follow all label directions for Apron XL use.

Soybean use rate\*

<b>ApronMAXX RFC**</b>	<b>Additional Apron XL</b>
1.5 fl oz/100 lbs. seed** or 0.005 fl oz/1,000 seed or 0.7 fl oz/140,000 seed	0.16-0.48 fl oz/100 lbs. seed or 0.0005-0.0016 fl oz/1,000 seed or 0.075-0.224 fl oz/140,000 seed
0.0092 mg ai/seed	0.005-0.0170 mg ai/seed

\*Based 3,000 seeds per pound.

\*\*Contains 3.75 g of mefenoxam and 2.5 g of fludioxonil/100 kg of seed.

**Legume Crops**

Bean (*Lupinus* spp.)

(grain lupin, sweet lupin, white lupin, white sweet lupin)

Bean (*Phaseolus* spp.)

(field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean)

Bean (*Vigna* spp.)

(adzuki bean, asparagus bean, black-eyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean)

Broad bean (fava bean)

Chickpea (garbanzo bean)

Guar

Jackbean

Lablab bean (hyacinth bean)

Lentil

Pea (*Pisum* spp.)

(dwarf pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea)

Pigeon pea

Sword bean

ApronMAXX RFC provides protection against damping-off and seed rots due to *Pythium*, *Phytophthora*, *Fusarium*, *Rhizoctonia* spp., and early season *Phytophthora* root rot. Additional Apron XL may be necessary depending on the type of pathogen and the level of disease pressure. Use the table below to determine the appropriate use rate of ApronMAXX RFC and Apron XL, if needed. Read and follow all label directions for Apron XL use.

Pathogens	Use Rate (fl oz/100 lbs. seed)	
	ApronMAXX RFC	Apron XL
<i>Pythium</i> (low pressure), <i>Fusarium</i> and <i>Rhizoctonia</i>	1.5	--
<i>Pythium</i> (high pressure), <i>Fusarium</i> and <i>Rhizoctonia</i>	1.5	0.16
<i>Pythium</i> (high pressure), <i>Phytophthora</i> , <i>Fusarium</i> and <i>Rhizoctonia</i>	1.5	0.48

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## **STORAGE AND DISPOSAL**

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Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

### **Pesticide Storage**

Store in the original container only in a cool, dry, secure place. Keep container closed when not in use. Do not store near food or feed. In case of spill on floor or paved surfaces, mop and remove to chemical waste storage area until proper disposal can be made if product cannot be used according to the label.

### **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 of the nearest EPA Regional Office for guidance.

### **Container Handling**

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  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, by incineration, or by other procedures approved by state and local authorities.

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

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For non-emergency (e.g., current product information), call Syngenta Crop Protection at 1-800-334-9481.
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Manufactured for:  
Syngenta Crop Protection, LLC  
P.O. Box 18300  
Greensboro, North Carolina 27419-8300

SCP 1195

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