



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

006403

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SEP 29 1987

SUBJECT: EPA File Symbol 707-EUP-RRG
Rally 60 DF Fungicide

FROM: Deloris F. Graham *DJH 10/5/87*
Technical Support Section
Fungicide-Herbicide Branch
Registration Division (TS-767C)

TO: Lois A. Rossi, PM 21
Fungicide-Herbicide Branch
Registration Division (TS-767C)

E 10/5/87

APPLICANT: Rohm and Haas Company
Independence Mall West
Philadelphia, PA 19105

ACTIVE INGREDIENT:

a-butyl-a-(4-chlorophenyl)-1H-1,2,4-
triazole-1-propanenitrile 40%

INERT INGREDIENTS: 60%

BACKGROUND:

According to a letter from the company dated September 15, 1987, they are submitting a Rabbit Skin Irritation Study and a Dermal Sensitization Study as requested by the Agency based on a Toxicology Branch review dated January 13, 1987. Studies conducted by Rohm and Haas Company and Hazleton Laboratories America, Inc. Data under EPA MRID Nos. 403432-01 and -02. Method of support not indicated.

RECOMMENDATION:

1. FHB/TSS finds these two studies acceptable to support conditional registration of this product.
2. The product is not considered a skin sensitizer.

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3. The appropriate toxicity category for the Skin Irritation Study is IV - CAUTION.

LABEL:

No precautionary labeling required in regard to hazard via primary skin irritation or dermal sensitization.

REVIEW:

- (1) Skin Irritation Study: Rohm and Haas Company; Report No. 87R-083; August 28, 1987; EPA MRID No. 403432-01.

PROCEDURE:

Six rabbits with intact skin sites each received 0.5 g of the test material mixed with 0.5 ml of 0.85% saline to form a paste. Treated sites placed under occlusive wrap for 4 hour exposure period. Observations were made for 7 days posttreatment.

RESULTS:

No irritation reported during 7 day observation period.

STUDY CLASSIFICATION: Core Guideline Data

TOXICITY CATEGORY: IV - CAUTION

- (2) Dermal Sensitization Study: Hazleton Laboratories; Project ID. HLA-417-424; August 26, 1987; EPA MRID No. 403432-02.

PROCEDURE:

Three groups consisting of an equal number of male and female guinea pigs were treated with one of the following substances: test material (20M + 20F); 1-chloro-2,4-dinitrobenzene (DNCB) at a 0.1% w/v concentration in 80% v/v aqueous ethanol (10M + 10F); sham control (10M + 10F). Each group received 3, 0.4 ml doses a week for 3.5 weeks of the appropriate material using the patch method. Twelve days following the last induction phase application a challenge dose of 0.4 ml of a 50% test material in distilled water was applied in the test group and 0.1% DNCB in acetone applied to

positive control group. Sham control group was treated at challenge with test material and DNCB. Observations made for 24 and 48 hours after each application.

RESULTS:

No irritation reported in test group animals during induction phase. Only + irritation at challenge in test group and sham control group.

Slight irritation reported in DNCB (positive control) group during induction phase. Slight to well defined irritation reported at challenge in treated group and + irritation in sham control.

It is concluded that no sensitization reaction was produced by test material. DNCB did produced a sensitization response.

STUDY CLASSIFICATION: Core Guideline Data

TOXICITY CATEGORY: Non-sensitizing

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FOR EXPERIMENTAL USE ONLY

Not for sale to any person other than a Participant or
Cooperator of the EPA approved Experimental Use Program

SYSTHANE™ 40W

AGRICULTURAL FUNGICIDE

For use only at an application site of a cooperator and in accordance
with the terms and conditions of the Experimental Use Permit.
This labeling must be in the possession of the user at the time of the
pesticide application.

NOTICE: Before using this product read the entire Precautionary Statements, Hazards to Humans and Domestic Animals, and Storage and Disposal Instructions.

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

The chemical, physical and toxicological properties of Systhane have
not been fully investigated and its handling, storage and use may be
hazardous.

Harmful if swallowed, inhaled, or absorbed through the skin. Do not
swallow, get in eyes, on skin or breathe spray mist. Wear goggles,
mid-forearm to elbow-length chemical-resistant gloves, hat, long-
sleeved shirt and long pants when mixing, loading and applying this
product. Contaminated clothing must be laundered separately in hot
water before reuse. Wash thoroughly after handling and before eating
or smoking.

STATEMENTS OF PRACTICAL TREATMENT

IF IN EYES: Flush eyes with a large amount of water for at least 15
minutes. Call a physician if irritation persists.

IF INHALED: Move victim to fresh air.

IF ON SKIN: Wash affected skin thoroughly with soap and water.

IF SWALLOWED: Do not induce vomiting. Give two glasses of water to drink and call
a physician. Never give anything by mouth to an unconscious person.

ENVIRONMENTAL HAZARDS

Do not apply directly to water or wetlands. Do not contaminate water
by cleaning of equipment or disposal of wastes. Do not apply when
weather conditions favor drift or runoff from areas treated.

DIRECTIONS FOR USE

Use of this pesticide in a manner inconsistent with the terms of the
experimental use permit is a violation of Federal Law.

GENERAL USE INFORMATION

- SYSTHANE is a systemic curative and protectant fungicide being evaluated for disease control on apples, grapes, and perennial grasses grown for seed. When treated as described under use directions, apples and grapes may be marketed only for fresh fruit. Applications to apples and grapes should be made with airblast or hydraulic spray equipment. Applications to perennial grasses grown for seed should use a minimum of 20 gallons of water per acre with ground boom sprayers and 7 to 10 gallons of water per acre for aerial application. Note specific restrictions for apples, grapes, and perennial grasses grown for seed.

USE RATE DETERMINATION — Carefully read, understand, and follow label use rates and restrictions.

ACCEPTED

for shipment and use of product
for experimental purposes under
the provisions of the Federal
Insecticide, Fungicide, and
Rodenticide Act.

Permit No. 707-EUP-105
Issued on 2/28/86

ACTIVE INGREDIENTS

1,4-bis(4-chlorophenyl) 1H-1,2,4-triazole 1

INERT INGREDIENTS

40%

50%

Total 100%

EPA Experimental Use Permit No. 707-EUP 105
U.S. Patent No. 4,266,165

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RE-ENTRY AND WORKER PROTECTION STATEMENTS

Do not enter treated areas without protective clothing until
sprays have dried. Because certain states may require more
restrictive re-entry intervals for various crops treated with this
product, consult your State Department of Agriculture for
further information. Do not apply this product in such a manner
as to directly or through drift expose workers or other persons.
The area being treated must be vacated by unprotected persons.
(See Use Directions for additional re-entry statements.)

STORAGE AND DISPOSAL

STORAGE: Keep away from fire and sparks. Store in a cool, dry,
well-ventilated area. Do not allow to become wet or overheated in
storage. Keep container closed when not in use.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by
storage or disposal. Pesticide wastes are toxic. Improper disposal of
excess pesticide, spray mixture, or rinsates 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 incineration or, if allowed by state and local authorities,
by burning. If burned, stay out of smoke.

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:
Wear eye protection. Wear protective clothing. Spray water on powder
or dust. Scoop or shovel solid material into a suitable container for
recovery or disposal. Keep dust to a minimum. Flush contaminated
area with a large amount of water to a chemical or sanitary sewer
containing a settling pit. Remove contaminated clothing promptly
and wash affected skin areas with soap and water. Thoroughly
launder clothing before re-use.

NOTICE OF WARRANTY

The product is for experimental use only. Rohm and Haas makes no
warranties of merchantability or fitness for a particular purpose nor
any other express or implied warranty except as stated herein.

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GENERAL USE INFORMATION

SYSTHANE is a systemic curative and protectant fungicide being evaluated for disease control on apples, grapes, and perennial grasses grown for seed. When treated as described under use directions, apples and grapes may be marketed only for fresh fruit. Applications to apples and grapes should be made with mistblast or hydraulic spray equipment. Applications to perennial grasses grown for seed should use a minimum of 20 gallons of water per acre with ground boom sprayers and 7 to 10 gallons of water per acre for aerial application. Note specific restrictions for apples, grapes, and perennial grasses grown for seed.

USE RATE DETERMINATION — Carefully read, understand, and follow label use rates and restrictions.

Crop	Diseases	Rate Of SYSTHANE Fungicide Per Application Oz./100 Gals.	Rate Of SYSTHANE Fungicide Per Application Oz./A	Remarks (Also Refer To Directions For Use)	Restrictions
Apples	Powdery mildew Scab Cedar-Apple Rust	2 to 2.5	7 to 10	Begin applications at green tip and repeat at 7 to 10 day intervals until danger of infection is past.	Do not apply within 14 days of harvest. Do not apply more than 5 pounds per acre per crop season. For use on fresh market apples only. Do not graze livestock in treated areas or feed cover crops grown in treated areas to livestock.
Grapes	Powdery mildew Black rot	—	2 to 5	Begin applications at prebloom and continue applications at 14 to 21 day intervals or as needed.	Do not apply within 14 days of harvest. Do not apply more than 1.5 pound per acre per crop season. For use on fresh market grapes only.
Perennial Grasses Grown For Seed (Perennial Ryegrass, Kentucky Bluegrass)	Rusts (Puccinia spp.)	—	4 to 8	Begin applications early spring or at first sign of rust infection and continue on a 14 to 21 day application schedule.	Do not apply within 21 days of harvest. Do not apply more than 2.0 pounds per acre per crop season. Do not graze livestock in treated areas or use any part of crop residues for feed or bedding purposes.

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