

100-640

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

JUN 21 2001

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Thomas J. Parshley
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419

Dear Mr. Parshley:

Subject: Labeling and Confidential Statement of Formula Amendments
Prime +
EPA Reg No 100-640
Your Correspondence Dated March 9, 2001, March 26, 2001, April 24, 2001, and
May 14, 2001

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions indicated below:

1. A heading entitled "Physical or Chemical Hazards" must be added to the label immediately below the Precautionary Statements, Hazards to Humans and Domestic Animals. The following statement must be included in that section: "Do not use or store near heat or open flame."
2. The First Aid statements must be in the following order: "If in eyes," "If on skin or clothing," and "If swallowed." Therefore, the label must be modified accordingly.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment.

The Confidential Statement of Formula (CSF) for the basic formulation dated April 19, 2001 is acceptable. The new basic formulation supersedes all previously accepted CSFs. A copy

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of the new CSF has been inserted into the file for this product.

Copies of the Product Chemistry review dated May 25, 2001 and the Acute Toxicology review dated May 29, 2001 are enclosed for your records.

If you have any questions regarding this letter, do not hesitate to contact me at (703) 305-7740 or María I. Rodríguez of my staff at (703) 305-6710.

Sincerely yours,



Cynthia Giles-Parker
Product Manager #22
Fungicide Branch
Registration Division (7505C)

Enclosure

(Front Cover)

Prime +®

A Plant Growth Regulator For
Control of Tobacco Suckers

ONE GALLON
U. S. Standard Measure

or

ONE QUART
U.S. Standard Measure

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUN 21 2001

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.**

100-640

Active Ingredient:

2-chloro-N-[2,6-dinitro-4-
(trifluoromethyl)phenyl]-N-ethyl-
6-fluorobenzenemethanamine

15%

Other Ingredients:

85%*

Total:

100%

*Contains petroleum distillates

Prime + contains 1.2 lbs. active ingredient per gallon.

EPA Reg. No. 100-640

KEEP OUT OF REACH OF CHILDREN.

DANGER/PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la
explique a usted en detalle. (If you do not understand the label, find
someone to explain it to you in detail.)

See additional precautionary statements and directions for use inside
booklet.

SCP 640A-L11(DRAFT) (1 Gal.) (EPA Est. 34704-MS-1)

SCP 640A-L10(DRAFT) (1 Qt.)

Product of Great Britain

Formulated in the USA

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 should 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, Inc. or Seller. All such risks shall be assumed by Buyer and User, and 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. This warranty does not extend to the use of the product contrary to label, instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and Buyer and User assume the risk of any such use. SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall SYNGENTA or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **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 limitations of warranty and of 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.

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, notification, 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 24 hours.

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 over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate or viton
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

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

Do not apply this product through any type of irrigation system.

GENERAL INFORMATION

Prime + is a plant growth regulator for the control of sucker growth on flue-cured, burley, dark, Maryland, and cigar tobacco.

One application of Prime + will provide full season control of excessive sucker development in tobacco. Read this label carefully and observe all directions and precautions.

MIXING INSTRUCTIONS

Mix 1 gal. of Prime + in 49 gals. of water or 2.5 fl. oz. of Prime + per one gal. of water. Provide sufficient agitation during mixing and application to maintain a uniform mixture.

Note: Do not mix Prime + with insecticides or fungicides.

APPLICATION INSTRUCTIONS

Time of Application

Apply Prime + when most tobacco plants are in the elongated button to early flower stage, either before or after topping. If Prime + is applied after topping, apply within 24 hours of topping. During topping, remove all suckers one inch or longer from all plants. (See notes listed below.)

Precision Hand Application

Mix 1 gal. of Prime + in 49 gals. of water and apply as a coarse spray or drench to the top of the tobacco stalk, using a hand-held drop line, or mix 2.5 fl. oz. of Prime + per gal. of water when using the jug method or backpack sprayer. Apply only once per plant per season. Apply the spray mixture at a rate sufficient to run down the stalk, contacting each leaf axil and just reach the ground line. Excessive spray volume may result in carryover injury to rotational crops. Spray volume per plant will generally be 1/3-2/3 fl. oz. depending on plant height. Do not exceed 30 gals. spray volume per acre when using hand application methods. (See notes listed below.)

Application with Powered Spray Equipment (3 nozzles per row)

Mix 1 gal. of Prime + in 49 gals. of water and apply at a rate of 30-50 gals. spray volume per acre. Use the high spray volume in tall types of tobacco, such as flue-cured, burley, Maryland, and cigar. Use the low spray volume only in short types of tobacco, such as dark. **Apply only**

once per season. Avoid application to plants treated by precision hand application method. Spray volume should be sufficient to run down the stalk, contacting each leaf axil and just reach the ground line. Excessive spray volume beyond the point of runoff to the soil may result in carryover injury to rotational crops. (See notes listed below.)

Apply Prime + as a coarse spray directed downward to the top of the tobacco stalk. This is best accomplished with 3 full cone nozzles per row: one nozzle directed downward over the center of the row and one 7-9 inches to each side of the center, directed at the top of the stalk. Maintain nozzles at a height of 12-16 inches above the top of the stalk during application. Maintain boom pressure at 20-25 psi, not exceeding 30 psi.

Sequential Application with Maleic Hydrazide

Prior to Use of Maleic Hydrazide

Mix 2 qts. of Prime + in 49.5 gals. of water and apply either by **Precision Hand Application** or **Application with Powered Spray Equipment** as described in those sections of this label. Timing of Prime + should be during the elongated button to early flower stage of tobacco.

Approximately one week after the Prime + application, apply maleic hydrazide, according to the directions, precautions, and restrictions on that label.

After Use of Maleic Hydrazide

For extended control of tobacco suckers, particularly during late tobacco harvests in FL, GA, NC, SC, and VA.

First, apply the regular schedule of contacts. Follow with the labeled rate of maleic hydrazide in accordance with its label. Follow with 2 qts. of Prime + in sufficient water to total 50 gals. to treat one acre 3-4 weeks after applying maleic hydrazide, depending on the development of suckers. To increase the effectiveness of Prime +, add 0.25% of X-77® (1 pt./50 gals.) to the spray solution.

Apply Prime + as a coarse spray, using powered spray equipment (3 nozzles per row) at least 7 days before the next leaf harvest. The spray volume should be sufficient to run down the stalk, contacting each leaf axil where suckers are present. Refer to the **Application with Powered Spray Equipment** section for specific instructions.

Notes: (1) Apply Prime + only once per tobacco season. (2) Prime + will not control large suckers. All suckers one inch or longer on all tobacco plants must be removed before application of Prime +. (3) Follow all precautions, notes, and other instructions on this label.

Tank Mix with Maleic Hydrazide

Mix 2 qts. of Prime + with $\frac{1}{2}$ to full rate of maleic hydrazide in sufficient water to total 50 gals. and apply at the recommended time for application of maleic hydrazide. Apply the mixture as a coarse spray at a volume of 50 gals./A with a boom pressure maintained at 20-25 psi by **Powered Spray Equipment** as described in that section of this label. For best results, follow precautions and restrictions on the Prime + and maleic hydrazide labels.

Application sequence: (1) Apply contact material according to its label. (2) Apply the tank mixture of Prime + and maleic hydrazide at or near the time suggested for application of maleic hydrazide on its label. (3) Make only one application of the tank mixture of Prime + plus maleic hydrazide per tobacco crop.

Notes

1. Timing is important: applications should be made at timing described above so that number and size of suckers will be small. Applications made before the elongated button stage of growth may result in chemical topping or distortion of leaves that were too immature at time of application. Spraying too late may result in poor sucker control.
2. Prime + will not control large suckers. All suckers one inch or longer on all plants must be removed before application of Prime +. Suckers that escape treatment should be removed by hand about 10-14 days after application.
3. Where a contact (fatty alcohol) is commonly used to control early suckers and provide a more uniform crop, the normal sequence would be: (a) apply contact material according to its label, and (b) about 5 days after application of contact material, apply Prime +. Timing of Prime + application should be during the elongated button to early flower stage.
4. Where a contact (fatty alcohol) is not used and a wide range of flowering exists, early flowering plants should be topped and suckers removed by hand. Then, when most plants are in the elongated button to early flower stage, remove all suckers one inch or longer, and apply Prime +. If Prime + is applied using precision hand application, early flowering plants can be topped and treated selectively; later flowering plants can be topped and treated as they reach the proper treatment stage; and a contact may not be needed.
5. For proper sucker control, Prime + must contact the small suckers on the axil where the leaf and stalk connect. Prime + will not control suckers on plants that are leaning at time of application.

Applications with powered spray equipment during windy periods are not recommended. High wind will disrupt the spray pattern of nozzles on boom sprayers and turn leaves causing improper contact and flow of the spray solution, resulting in poor sucker control. Application to wet plants or drought-stressed plants may result in poor sucker control.

6. Carefully follow the use rates and spray volume recommended, and spray field uniformly. Volume should be sufficient to run down the stalk, contact each leaf axil, and just reach the ground line.
7. Rain occurring within 2 hours after spraying may reduce effectiveness.

Precautions: (1) To avoid illegal residues and possible injury to crops planted in the fall or following spring, do not apply excessive spray volume to the point of runoff onto the soil. Prime + residues in the soil may interact with dinitroaniline herbicides, such as Balan®, Paartan®, Prowl®, or Treflan®, to increase early season crop stunting. Thorough disking and deep tillage in the fall are recommended where excessive amounts of Prime + may have reached the soil. (2) When tobacco is in a state of very rapid, succulent growth due to high nitrogen and rainfall, Prime + may cause injury. Under these conditions, use only the precision hand application method and avoid contacting leaves with the spray solution.

STORAGE AND DISPOSAL

Pesticide Disposal

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Wastes resulting from the use of this product are acutely hazardous. Improper disposal of unused pesticide, spray mixture, or rinsate that cannot be used according to label instructions must be disposed of according to federal, state, or local procedures. For guidance in proper disposal methods, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office.

Container Disposal

Do not reuse empty container. Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or by open burning, if allowed by state and local authorities. If burned, keep out of smoke.

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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. In the event of a major spill, fire, or other emergency, call 1-800-888-8372, day or night.

Store at temperatures above 32°F.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER/PELIGRO

Corrosive. Causes irreversible eye damage. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with eyes, skin, or clothing. Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing spray mist.

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 swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a 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 or convulsing person.
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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-888-8372 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
If ingested, lavage stomach with care to avoid aspiration. Treat symptomatically.	

Personal Protective Equipment

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category G on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate or viton

- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron, when cleaning equipment, mixing, or loading

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statements

When handlers use closed systems or enclosed cabs 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 immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Environmental Hazards

This product is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment wash water.

Prime +® trademark of Syngenta
U.S. Patent No. 4,169,721

Balan®, Paarlán®, and Treflan® trademarks of Dow AgroSciences

Prowl® trademark of American Cyanamid Company

X-77® trademark of Loveland Industries, Inc.

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Product of Great Britain

Formulated in the USA

Syngenta Crop Protection, Inc.
Greensboro, North Carolina 27409
www.syngenta-us.com

SCP 640A-L11(DRAFT) (1 Gal.) (EPA Est. 34704-MS-1)

SCP 640A-L10(DRAFT) (1 Qt.)

- Revised August 17, 1983
- Revised February 3, 1984
- Revised December 8, 1984
- Revised September 4, 1985
- Revised May 12, 1987
- Revised November 20, 1989
- Revised April 25, 1991
- Revised January 17, 1992
- Revised September 2, 1993
- Revised September 8, 1993
- Revised February 10, 1995
- Revised April 16, 1997
- Revised May 5, 1998
- Revised October 18, 1999
- Revised March 5, 2001

[QUARK/PRIME +/N-PRIME + BKLT-B] - ccg - 3/8/01

Precautionary Statements

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STORE AT TEMPERATURES ABOVE 32°F.

Prime +® trademark of Syngenta
U.S. Patent No. 4,169,721

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