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

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OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Theresa Kamicker CIBA-GEIGY CORP. P. O. Box 18300 Greensboro, NC 27419

Subject:

Label Amendment Submission of 09/15/93 in Response to PR Notice 93-7

EPA Reg. No. 100-643

TRUIMPH 4E INSECTICIDRE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling AND
- WITHIN one year from date of this acceptance.



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WPS

15 Gallon Label Booklet 2 1/2 Gallon Label Booklet One Gallon Label Booklet One Ouart Label Booklet

RESTRICTED USE PESTICIDE

For Retail Sale To and Use Only By
Certified Applicators Or Persons Under
Their Direct Supervision And Only For
Those Uses Covered By The Certified
Applicator's Certification. Restricted
Due to Avian, Fish, and Aquatic
Organism Toxicity.

Triumph® 4E

ACCEPTED
with COMMENTS
In EPA Letter Dated

| For Insect Control Only in Turf as Specified in Directions for Use | MAR 1994 Under the Federal Insecticide, Fundicide, and Redenticide Act as amended, for the posticide registered under EPA Reg. No. |
|--|--|
| Active Ingredient: Isazofos: Q-(5-chloro-1-[isopropyl] | registered under EPA Reg. No. |
| -1 <u>H</u> -1 ,2,4 $-$ triazol -3 -yl) Q,Q-diethyl | |
| (thiophosphate) | 46.8% |
| <pre>Inert Ingredients*:</pre> | 53.2% |
| Total: | 100.0% |

*Contains xylene

Triumph 4E contains 4 lbs. active ingredient per gallon

EPA Reg. No. 100-643 EPA Est. 100-AL-1

KEEP OUT OF REACH OF CHILDREN

WARNING/AVISO

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

See directions for use and additional precautionary statements inside booklet.

CGA 48L16B (15 Gallon Mini-Bulk)
CGA 48L7C (2 1/2 Gallon Master Label)
CGA 48L14C (1 Gallon)
CGA 48L13D (1 Quart)
U. S. Standard Measure

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DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire <u>Directions for Use</u> and the <u>Conditions of Sale and Warranty</u> before using this product. If terms are not acceptable, return the unopened product container at once.

Conditions of Sale and Warranty

The <u>Directions for Use</u> of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of Ciba-Geigy or the Seller. All such risks shall be assumed by the Buyer.

Ciba-Geigy warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the <u>Directions for Use</u> subject to the inherent risks referred to above. <u>Ciba-Geigy makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall Ciba-Geigy or the <u>Seller be liable for consequential</u>, special, or indirect damages resulting from the use or handling of this product. Ciba-Geigy and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing <u>Conditions of Sale and Warranty</u>, which may be varied only by agreement in writing signed by a duly authorized representative of Ciba-Geigy.</u>

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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

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NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

As soon as application is complete, apply 1/2 inch of water and allow grass to dry before children or pets are allowed on treated area.

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND ALL PRECAUTIONS ON THIS LABEL MAY RESULT IN GRASS INJURY, ADVERSE EFFECTS TO NON-TARGET ORGANISMS, OR POOR PEST CONTROL.

General Information

Triumph 4E is an emulsifiable concentrate which, when diluted with water and used according to label directions, controls numerous turf pests on lawns and other turf. DO NOT TREAT GOLF COURSE FAIRWAYS.

NOTES: 1) See Environmental Hazards and Special Precautions to Avoid Hazard to Aquatic Organisms for additional instructions to ensure the proper use of Triumph. 2) Do not apply to sand or loamy sand soils. 3) As soon as application is complete, irrigate treated area with a minimum of 1/2 inch of water. 4) To avoid illegal residues, do not graze or use treated turf for feed. 5) Do not apply aerially.

SPECIAL PRECAUTIONS TO AVOID HAZARD TO AQUATIC ORGANISMS

Triumph 4E is highly toxic to fish and other aquatic organisms. Runoff resulting from rainfall or irrigation to treated turf may kill fish and other aquatic organisms.

To avoid hazard to fish and other aquatic organisms, follow these instructions:

DO NOT apply to turf sites that border lakes, ponds, or streams.

DO NOT apply to turf sites that drain into ditches, storm sewers, or other surface drainage systems that flow into local reservoirs, holding ponds or other bodies of water.

Applicators MUST evaluate the following environmental factors prior to use of Triumph 4E on turf:

<u>Residential Lawns</u>: Survey the site prior to application to ensure that treatment areas do not border lakes, ponds, or streams.

GOLf Courses: Apply only to tees, greens, and aprons. DO NOT APPLY TO FAIRWAYS. Inspect tees, greens and aprons prior to application to ensure that they do not border lakes, ponds, or streams or that these areas do not drain directly into ditches that carry water into lakes, ponds, or streams.

Other Turf Sites (Especially Condominium, Apartment, and Housing Complexes): Survey the site prior to application to ensure that treatment areas do not border lakes, ponds, or streams. Review drainage system with site manager to determine location of drainage ditches, storm sewers, or other surface drainage systems that drain directly into local holding ponds, reservoirs, lakes, or streams. Apply Triumph 4E ONLY after this evaluation demonstrates that treatment sites do not border lakes, ponds, or streams or that application sites do not drain directly into such areas by way of ditches, storm sewers, or tile systems.

Mixing Instructions

Fill the spray tank 1/2 to 3/4 full with water, add the measured amount of Triumph 4E, then add the rest of the water. Provide sufficient agitation during mixing and spraying to maintain a uniform emulsion.

Sprayer Equipment

Use conventional spray equipment. After use, rinse equipment thoroughly with clean water.

Application

A maximum of 1 application of Triumph 4E per year is permitted for the 1.5 fl. oz./1,000 sq. ft. (2 qt./A) rate. A maximum of 2 applications per year at least 60 days apart is permitted for the 0.75 fl. oz./1,000 sq. ft. (1 qt./A) rate. A maximum of 4 applications per year at least 60 days apart is permitted for the 0.375 fl. oz./1,000 sq. ft. (0.5 qt./A rate). Apply in sufficient water volume to provide uniform coverage.

Use Rates and Pests Controlled

Triumph 4E will control specific turf pests when used as directed. Refer to the table below for use rates and pests controlled.

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Triumph 4E can be used at low rates to effectively control bill-bugs, sod webworms, tropical sod webworms, chinch bugs, and ants when the product is used in conjunction with integrated pest management practices. These practices include scouting for insect activity, determination of optimum timing for pesticide application, consideration of damage threshold levels, noting environmental conditions that affect efficacy, and determination of the level of tolerance for turf damage. If Triumph is to be used as a part of such an integrated pest management program, use the lowest rate listed in the chart below for surface feeding insects.

| Amount o | of | |
|----------|----|-----|
| Triumph | 4E | Per |
| 1000 50 | ft | |

<u>Pest</u>

Information

Armyworms, Clover mites, Crickets*, Cutworms, Grasshoppers*, Leafhoppers, Millipedes*

0.75 fl. oz.

For best control, apply at first sign of pest damage.

*For insects living near homes, in addition to tre ting the lawn, spray a 5-foot band of the lawn around the house. If lawn was treated, take care not to overlap previously treated area.

Argentine Ants (Iridomyrex species) Odorous House Ant (Tapinoma species) Little Black Ant (Monomorium species) Cornfield Ant, Larger Yellow Ant (Lasius species) Pavement Ant (Tetramorium species) Texas Leafcutting Ant, Allegheny

0.375 to 0.75 fl. oz.

For best results, apply at first sign of pest damage.

Use the lower rate in IPM programs.

Chinch Bugs, Sod Webworms, Tropical Sod Webworms

Mound Ant

Big-Headed Ant (Pheidole species)

(Formica species)

0.375 to 0.75 fl. oz.

:

For best results, apply at first sign of pest damage.

Use the lower rate in IPM programs.

| <u>Pest</u> | Amount of Triumph 4E Per 1000 sq. ft. | Information |
|--|---|---|
| White grubs, such as Japanese beetle, European chafer, Southern masked chafer, Green June beetle, May/June beetle, Phyllophaga spp., Black turfgrass Ataenius, Asiatic garden beetle, Annual white grub, Dung beetle | 1.5 fl. oz. | Apply after adults have ceased egg laying, usu-ally in the late summer. |
| Mole Crickets | 1.5 fl. oz. | Apply in the spring when nymphs are small. |
| Annual bluegrass weevil (Turfgrass weevil) Hyperodes weevil | 1.5 fl. oz. | Apply in the spring when damage is first noted. |
| Billbugs | 0.375 or 1.5 fl. oz. | Apply in the spring when adults first appear. Use the lower rate in IPM programs. |

Storage and Disposal

A11:

Storage: Do not store in or around the home. Do not store below 0°F. Do not contaminate water, food, or feed by storage or disposal.

<u>Pesticide Disposal</u>: Wastes resulting from use of this product 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 at the nearest EPA Regional Office for quidance.

(2 1/2 Gallon, 1 Gallon, 1 Quart Plastic):

<u>Container Disposal</u>: Triple rinse (or equivalent) then puncture and dispose of in a sanitary landfill, or incinerate, or burn if allowed by state and local authorities. Stay out of smoke from burning container.

(15 Gallon Mini-Bulk)

Container Refilling and Disposal

Refer to label on container for container disposal instructions.

All:

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.

Precautionary Statements

Hazards to Humans and Domestic Animals

WARNING/AVISO

May be fatal if swallowed, inhaled, or absorbed through the skin. Do not get on skin or clothing. Do not breathe vapors or spray mist. Avoid contact with eyes.

Statement of Practical Treatment

This product is an organophosphate.

If swallowed: Call a physician or poison control center immediately. DO NOT INDUCE VOMITING UNLESS NO OTHER TREATMENT IS AVAILABLE. Vomiting may cause aspiration pneumonia. If it is necessary to induce vomiting, do so under medical supervision. Give victim one or two glasses of water and induce vomiting by touching back of throat. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.

If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth unless exposure was due to swallowing then use cardiopulmonary resuscitation (CPR). Get medical attention.

If on skin: Remove—contaminated clothing—and—wash skin with plenty of soap and water. Get medical attention.

If in eyes: Flush immediately with plenty of water. Get medical attention if irritation persists.

Note to Physician: Lavage stomach with care to prevent aspiration into lungs. Leave lavage tube in place. Make a thin water slurry of activated charcoal with 30 grams of charcoal in 3-4 oz. of water. Instill the slurry through the lavage tube into the stomach and leave slurry in place. Atropine sulfate and 2-PAM are specific antidotes. Morphine, theophylline, aminophylline, and large amounts of intravenous fluids are contraindicated.

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.

WPS USES:

Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural-plant uses are covered -- must wear:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant apron when cleaning equipment, mixing, or loading
- Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

NON-WPS USES:

Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) -- in general, only agricultural-plant uses are covered by the WPS -- must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

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 pesticide is toxic to fish, aquatic invertebrates, and wildlife. As soon as application is complete, apply 1/2 inch of water, however, stop watering before puddling or runoff occurs. Avoid overwatering since excessive watering may reduce performance and increase potential runoff. Refer to the section Special Precautions to Avoid Hazard to Aquatic Organisms under the Directions for Use section for specific use directions to avoid hazard to fish and other aquatic organisms. Do not apply directly to water or wetlands. Do not overlap spray patterns. Do not apply when weather conditions favor drift from treated areas. Cover, disc, or incorporate spill areas. Do not contaminate water by cleaning of equipment or disposal of wastes.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

Triumph® trademark of Ciba-Geigy Corporation U.S. Patent Nos. 3,867,396; 3,932,629

€1993 Ciba-Geigy Corporation

Ciba Plant Protection
Turf and Ornamental Products

Ciba-Geigy Corporation Greensboro, North Carolina 27419

CGA 48L16B (15 Gallon Mini-Bulk)

CGA 48L7C (2 1/2 Gallon Master Label)

CGA 48L14C (1 Gallon) CGA 48L13D (1 Quart)

> September 18, 1992 Revised September 3, 1993

[GANNONC.LABELT]TRM4BKWP - 5/9/93

CONTAINER LABEL (2 1/2 GALLON, 1 GALLON, 1 QUART)

RESTRICTED USE PESTICIDE

For Retail Sale To and Use Only By
Certified Applicators Or Persons Under
Their Direct Supervision And Only For
Those Uses Covered By The Certified
Applicator's Certification. Restricted
Due to Avian, Fish, and Aquatic Organism Toxicity.

Triumph® 4E Insecticide

For Insect Control Only in Turf as Specified in Directions for Use

Active Ingredient:

Isazofos: Q-(5-chloro-1-[isopropyl]
-1H-1,2,4-triazol-3-yl) Q,Q-diethyl

| (thiophosphate) | 46.8% |
|--------------------------------|--------|
| <pre>Inert Ingredients*:</pre> | 53.2% |
| Total: | 100.0% |

*Contains xylene

Triumph 4E contains 4 lbs. active ingredient per gallon

KEEP OUT OF REACH OF CHILDREN

WARNING/AVISO

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

See directions for use in attached booklet.

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AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

EPA Req. No. 100-643

EPA Est. 100-AL-1

Triumph® trademark of Ciba-Geigy Corporation

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Ciba Plant Protection Turf and Ornamental Products Ciba-Geigy Corporation Greensboro, North Carolina 27419

CGA 48L16B (15 Gallon Mini-Bulk)

CGA 48L7C (2 1/2 Gallon Master Label) CGA 48L14C (1 Gallon)

CGA 48L14C (1 Gallon) CGA 48L13D (1 Quart)

U.S. Standard Measure

Precautionary Statements

Hazards to Humans and Domestic Animals

WARNING/AVISO

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Environmental Hazards

This pesticide is toxic to fish, aquatic invertebrates, and wildlife. As soon as application is complete, apply 1/2 inch of water, however, stop watering before puddling or runoff occurs. Avoid overwatering since excessive watering may reduce performance and increase potential runoff. Refer to the section Special Precautions to Avoid Hazard to Aquatic Organisms under the Directions for Use section for specific use directions to avoid hazard to fish and other aquatic organisms. Do not apply directly to water or wetlands. Do not overlap spray patterns. Do not apply when weather conditions favor drift from treated

areas. Cover, disc, or incorporate spill areas. Do not contaminate water by cleaning of equipment or disposal of wastes.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

Storage and Disposal

<u>Storage</u>: Do not store in or around the home. Do not store below 0°F. Do not contaminate water, food, or feed by storage or disposal.

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.

<u>Pesticide Disposal</u>: Wastes resulting from use of this product 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 at the nearest EPA Regional Office for guidance.

<u>Container Disposal</u>: Triple rinse (or equivalent) then puncture and dispose of in a sanitary landfill, or incinerate, or burn if allowed by state and local authorities. Stay out of smoke from burning container.

CGA 48L7C (2 1/2 Gallon Master Label)

CGA 48L14C (1 Gallon) CGA 48L13D (1 Quart)

[GANNONC.LABELT]TRM4BKWP - 9/9/93