

125

DEC 31 1992

Dr. N. Beth Carroll
Regulatory Manager
Agricultural Division
CIBA-GEIGY Corporation
P.O. Box 18300
Greensboro, NC 27407

320/416,243
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300/424,755
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Dear Dr. Carroll:

Subject: • 7/29/92 Correction to Labeling Submitted 6/8/92
• Trigard Labeling Revising the Re-entry Statement
• Leafy Vegetable Use Addition Residue Issues

EPA Registration No. 100-654
Pesticide Petition No. 1F4016

The labeling referred to above, submitted 7/29/92 in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable subject to the following comments.

1) Modify the statement "Do not enter treated areas without protective clothing until seven days after the last application." to read "Do not enter treated areas without protective clothing until sprays have dried."

2) Modify "Oral warnings must be given which inform workers of areas of fields that may not be entered without specific protective clothing until seven days after last application and appropriate actions to take in case of accidental exposure as described under **Precautionary Statements** on this label." to read "Oral warnings must be given which inform workers of areas of fields that may not be entered without appropriate protective clothing until sprays have dried and appropriate actions to take in case of accidental exposure as described under **Precautionary Statements** on this label."

3) Modify "Do not enter without appropriate protective clothing until seven days after last application." to read "Do not enter treated areas without protective clothing until sprays have dried."

CONCURRENCES							
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4) Modify the Environmental Hazards statements to read as follows. "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 when disposing of equipment washwaters. Do not apply when weather conditions favor drift from target area."

5) A stamped copy of the label is enclosed for your records. Submit five (5) copies of final printed labeling.

The residue data supporting the leafy vegetable use addition has been reviewed by our Health Effects Division and a copy of their review is enclosed for your information. Please note that recovery data through FDA multiresidue methods for cyromazine and melamine must be submitted.

Sincerely,



Phil Hutton
Product Manager 18
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

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395

ACCEPTED
with COMMENTS
in EPA Letter Dated

DEC 31 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
100-654



CIBA-GEIGY

Trigard®

6 x 2.66 Ounce
Water Soluble
Packets

Total 15.96 Ounces
Net Weight

INSECTICIDE

For leafminer control in
celery and head lettuce

Active Ingredient: Cyromazine: *N*-cyclopropyl-
1,3,5-triazine-2,4,6-triamine 75%

Inert Ingredients: 25%

Total: 100%

Trigard is a wettable powder.

EPA Reg. No. 100-654 EPA Est. 10163-AZ-1

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and
directions for use on panel at right.

This outer protective carton contains Trigard in six small water soluble packets. These packets and their contents dissolve in water. After opening outer carton, cut across liner just below seal to open liner, immediately dump the required number of unopened packets into the partially filled sprayer or mix tank. Do not handle the soluble packets or expose them to moisture, since this may cause rupturing. If not using all water soluble packets, use clip-closure to reclose inner foil liner and fold liner down into carton over remaining soluble packets. Close carton by inserting tab on top of carton into the slot provided.

DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

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

Conditions of Sale and Warranty

The Directions for Use 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 Directions for Use subject to the inherent risks referred to above. **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 Seller be liable for consequential, 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 Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of CIBA-GEIGY.

DIRECTIONS FOR USE

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

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

Trigard is a 75% wettable powder which, when mixed with water according to the directions for use given below, will control certain insect species on designated plants.

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.

Reentry Statement

Do not enter treated areas without protective clothing until seven days after last application.

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Oral warnings must be given which inform workers of areas or fields that may not be entered without specific protective clothing until seven days after last application and appropriate actions to take in case of accidental exposure as described under Precautionary Statements on this label. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: "CAUTION. Area treated with Trigard on (date of application). Do not enter without appropriate protective clothing until seven days after last application. In case of accidental exposure, flush eyes or skin with plenty of water. Call a physician if irritation persists. Remove and wash contaminated clothing before reuse."

Mixing Instructions

Prepare no more spray mixture than is needed for the immediate operation. Thoroughly clean spray equipment before using this product. Agitate thoroughly before and during application. Good by-pass agitation is sufficient to keep Trigard thoroughly mixed. Flush spray tank thoroughly with water daily after use and dispose of pesticide rinsate by application to an already treated area.

Trigard Alone: Add $\frac{2}{3}$ of the required amount of water to the spray or mixing tank. With the agitator running, drop the required number of unopened soluble packets of Trigard into the tank. (One 2.66 oz. water soluble packet of Trigard will treat 1 acre of celery or lettuce.) Continue agitation while adding the remainder of the water.

Note: Do not let spray mixture stand overnight in the spray tank. Rinse spray tank at the end of the day.

To avoid spray drift, do not apply under windy conditions. Avoid spray overlap, as crop injury may result.

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

Special Precautions to Minimize Exposure

When mixing, loading and applying Trigard by ground application the user must wear long-sleeved shirt, long pants, and the following protective equipment: chemical-resistant gloves, boots, and head covering. If a closed cab ground application machine or aerial application is used, the previously described protective clothing is not required for applicators.

Celery and Lettuce (Head Only)

For leafminer control, apply $\frac{1}{4}$ lb. (one packet) Trigard per acre as a foliar spray in a minimum of 5 gals. of water by air or 50 gals. of water by ground as leafminers first appear. Repeat applications at 7-day intervals or as necessary to maintain control.

Notes: (1) Do not make more than 12 applications to one crop of celery or 8 applications to one crop of lettuce, and (2) Do not make the last application within 7 days of harvest, or illegal residues may result.

Rotational Crops

All crops on this label may be planted following harvest of a Trigard-treated crop. Do not rotate to any other crop, except sweet corn or radishes. Do not plant sweet corn or radishes within 3 months after last application.

Storage and Disposal

Store in a cool, dry place. Do not contaminate water, food, or feed by storage or disposal. Do not use in animal feeds.

Storage - Do not store this product under wet conditions. Handle outer carton carefully to avoid breakage of water soluble packets.

Pesticide Disposal - Improper disposal of unused pesticide, spray mixture, or rinsate is a violation of federal law. 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 Fertilizer or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office.

BEST AVAILABLE COPY

Container Disposal – Do not reuse outer carton. Dispose of empty outer carton in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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 1-800-886-8372 day or night.

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. Wear long-sleeved shirt and pants when handling or applying this product. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Statement of Practical Treatment

If swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If on skin: Wash with plenty of soap and water. If irritation develops or persists, get medical attention.

If in eyes: Flush with plenty of water. If irritation develops or persists, get medical attention.

If inhaled: Move to fresh air.

Environmental Hazards

Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from target area.

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Agricultural Division

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CGA 69L50A

072