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100-654

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 24 1994

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

Dear Dr. Carroll:

Subject: Approval of Modified Label with Florida Only Chinese Mustard & Chinese Cabbage New Uses / Trigard®
EPA Registration No. 100-654

The crop addition amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(B), is acceptable provided that you:

1) Satisfy the following toxicology data requirement by November 1995.

<u>Guideline Reference Number</u>	<u>Title of Study</u>	<u>Test Substance</u>
81-3	Acute Inhalation Toxicity in Rats	Trigard® End-Use Product

2) Conduct well-water monitoring in Florida celery and head lettuce use sites to determine if cyromazine and/or melamine contamination has taken place and submit the results.

3) Either a) perform a well-water monitoring study in \$18 Texas pepper use areas provided that study design follows EPA guidance regarding site characterization, etc. or b) perform an additional prospective ground-water study in a site that would represent all other use sites other than those similar to that of the current Florida study.

CONCURRENCES

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Registration of Chinese Cabbage and Chinese Mustard
 EPA Reg. No. 100-554

4) As you have committed to do in your 10/18/94 letter to Phillip Hutton, address the Agency's concerns on the potential for surface water contamination.

5) Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

6) Submit production information (pounds or gallons produced) for this product for the fiscal years in which the uses on Chinese mustard and Chinese cabbage for use in Florida only are conditionally amended in accordance with FIFRA section 29. The fiscal year begins October 1 and ends September 30. The production information will be submitted to the Agency no later than November 15, following the end of the preceding fiscal year. This information should be submitted to:

U.S. Environmental Protection Agency
 Office of Pesticide Programs (7505W)
 Document Processing Desk (RSB)
 401 M Street SW., CM #2
 Washington, DC 20460

7) Modify your product label as directed by the following comments before you release the amended product for shipment.

- a) On the front panel of the label, add "Chinese mustard (Florida Use Only), Chinese cabbage (Florida Use Only)," after "...spinach, peppers".
- b) On page 4, delete "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."
- c) Under the heading on page 4 titled "Trigard Alone:" add "Chinese mustard (Florida Use Only), Chinese cabbage (Florida Use Only)," after "...peppers, spinach".
- d) Modify the heading "Chinese Mustard and Chinese Cabbage (FL Only)" on page 5 to read "Chinese Mustard (Florida Use Only) and Chinese Cabbage (Florida Use Only)".
- e) Add "Avoid breathing dust." to the Hazards to Humans and Domestic Animals section.

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Trigard®
EPA Reg. No. 100-854

8) Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA § 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

All further correspondence regarding Trigard® should now be directed to George LaRocca, PM 13, (703-305-6100) as this product is now being transferred to his team.

Sincerely,

Phillip Hutton
Product Manager 18
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

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Current Label (Water Soluble Carton)

Trigard®

Insecticide

For leafminer control in celery, head and leaf lettuce, spinach, peppers and cucurbits

Active Ingredient:

Cyromazine: N-cyclopropyl-1,3,5-triazine-2,4,6-triamine	75%
Inert Ingredients:	25%
Total	100%

Trigard is a wettable powder

KEEP OUT OF REACH OF CHILDREN.

CAUTION

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

EPA Reg. No. 100-654

EPA Est. 10163-AZ-1

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.

6 X 2.66 Ounce Water-Soluble Packets
Total 15.96 Ounces
Net Weight

Ciba-Geigy

ACCEPTED
with **COMMENTS**
in EPA Letter Dated
OCT 24 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
100-654

DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the enclose 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.

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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 12 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
- Waterproof gloves
- Chemical-resistant footwear plus socks

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.

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... by this product in a minimum of 5 days. Areas to be directly treated must be vacated by unprotected persons.

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 bypass 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 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, lettuce, peppers, spinach or cucurbits.) 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.

Aerial applications should be used only when conditions exist that prohibit application by ground equipment. Applications by ground equipment should be directed towards crop foliage.

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

Celery, Head and Leaf Lettuce, and Spinach

For leafminer control, apply 1/6 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 6 applications to one crop of celery or head lettuce, 2) Do not make more than 5 applications to one crop of leaf lettuce or spinach, and 3) Do not make the last application within 7 days of harvest, or illegal residues may result.

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For leafminer control, apply 1/6 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 6 applications to one crop of Chinese mustard or Chinese cabbage, and 2) Do not make the last application within 7 days of harvest, or illegal residues may result.

Peppers

For leafminer control, apply 1/6 lb. (one packet) Trigard per acre as a foliar spray in a minimum of 50 gallons of water by ground equipment or in a minimum of 5 gals. of water by air as leafminers first appear. Repeat applications at 7-day intervals or as necessary to maintain control.

Notes: 1) Do not make more than 6 applications to one crop of peppers, and 2) Do not make last application within 7 days of harvest, or illegal residues may result.

Cucurbits*

*Cucurbits include balsam pear (bitter melon), Chinese waxgourd (Chinese preserving melon), citron melon, cucumber, gherkin, edible gourds, melons (including hybrids: cantaloupe, casaba, crenshaw, honeydew melons, honey balls, mango melon, muskmelon, Persian melon), pumpkin, summer squash, winter squash, and watermelon (including hybrids).

For leafminer control, apply 1/6 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: To avoid possible illegal residues, 1) Do not make more than 6 applications per growing season to cucurbits and 2) Cucurbits may be harvested on the same day of the last application.

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

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sweet corn or milo. Do not use on other crops or for other uses.

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 Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office.

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 1-800-888-8372 day or night.



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.

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.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Chemical-resistant footwear plus socks

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, enclosed cabs, or aircraft 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.

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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

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 wash waters. Do not apply when weather conditions favor drift from target area.

Ground Water Advisory

A Trigard metabolite has been found in ground water as a result of agricultural use. Use of this product in areas where soils are permeable and water tables are shallow could result in leaching to ground water. Irrigation could increase the risk of contamination.

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Ciba Plant Protection
Ciba-Geigy Corporation
Greensboro, North Carolina 27419

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