

100-654

5-3-2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

May 3, 2007

Greg Watson, Ph.D
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greenboro, NC 27419-8300

Subject: Notification - Addition of NY State Restriction
Trigard Insecticide
EPA Reg. No. 100-654
Your Application Dated April 26, 2007

Dear Dr. Watson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 26, 2007 for the above mentioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

4/24

NOTIFICATION

MAY 8 2002

(Booklet for stand-up pouch)

Trigard® Insecticide

GROUP 17 INSECTICIDE

For control of leafminers in Abyssinian and seakale cabbage, bulb vegetables, cucurbits, certain varieties of dried beans, Hanover salad, leafy vegetables including *Brassica*, succulent lima beans, peppers, tomatoes, and turnip greens and control of Colorado potato beetle and leafminer in potatoes.

Active Ingredient:	
Cyromazine (CAS No. 66215-27-8)	
2,4,6-triamine	75.0%
<hr/>	
Other Ingredients:	25.0%
Total:	100.0%

Trigard Insecticide is a wettable powder.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use in booklet.

This outer protective container contains Trigard Insecticide in 6 small water-soluble packets. These packets and their contents dissolve in water. After opening outer container, 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.

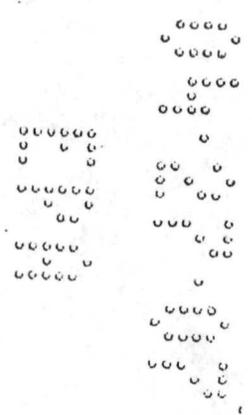
EPA Reg. No. 100-654

EPA Est. _____

SCP 654A-L(draft)

6 X 2.66 ounces
Water-Soluble Packets

15.96 ounces
Total Net Weight



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 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.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have 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 person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER	
For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372	

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. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants



- Chemical-resistant gloves made of any waterproof material – Category A (e.g., barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinylchloride [PVC] or viton)
- 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.

User Safety Recommendations

Users should:

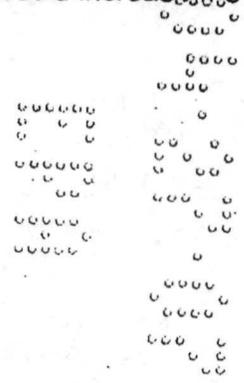
- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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

Ground Water Advisory

A metabolite of Trigard Insecticide has been found in ground water, possibly 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.



DIRECTIONS FOR USE

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

Trigard Insecticide must be used only as directed in accordance with recommendations on this label or in separately published Syngenta supplemental labeling recommendations for this product.

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
- Chemical-resistant gloves made of any waterproof material – Category A (e.g., barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinylchloride [PVC] or viton)
- 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.

NOT FOR SALE, SALE INTO, DISTRIBUTION AND/OR USE IN NASSAU AND SUFFOLK COUNTIES, NEW YORK

GENERAL INFORMATION

Trigard Insecticide is a 75% wettable powder. When this product is mixed with water and applied according to the directions for use to the specified crops on this label, Trigard Insecticide will control the specified insects in the crops that are listed on this label.

Resistance Management

Trigard Insecticide is a Group 17 Insecticide (contains the active ingredient cyromazine). Because of the inherent risk of resistance development to any product, it is strongly advised that Trigard Insecticide be used in a sound resistance management program. Treatment may not be effective against labeled pests if Trigard Insecticide tolerant strains develop.

For plants that host a labeled pest with multiple generations per crop or year it is recommended to follow the following resistance management practices that may include, but are not limited to:

- Rotating Trigard Insecticide with products with different modes of action
- Avoiding treatment of successive generations with Trigard Insecticide
- Using labeled rates at specified spray intervals
- Using non-chemical alternatives such as beneficial arthropods
- Using various cultural practices such as rotating susceptible to non-susceptible plants

For additional information about implementing these or other resistance management practices, consult your local agricultural advisor or company representative.

MIXING AND APPLICATION INSTRUCTIONS

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

Trigard Insecticide Alone:

- 1) Add $\frac{2}{3}$ of the required amount of water to the spray or mixing tank.



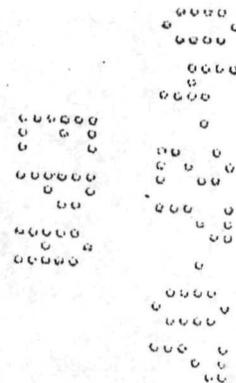
- 2) With the agitator running, drop the required number of **unopened** soluble packets of Trigard Insecticide into the tank. (One 2.66 oz. water-soluble packet of Trigard Insecticide will treat one acre.)
- 3) Continue agitation while adding the remainder of the water.

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, because crop injury may result.
- Use aerial application only when conditions prevent application with ground equipment.
- When using ground application equipment direct the spray toward crop foliage.

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

Greenhouses: Do not use this product in greenhouses.



CROP USE DIRECTIONS

BEANS, DRIED VARIETIES EXCEPT COWPEAS AND SOYBEANS*

*Adzuki beans, black-eyed peas, broad beans (dry), catjang, chick peas, Crowder peas, field beans, garbanzo beans, grain lupin, guar, kidney beans, lablab beans, lentils, lima beans (dry), moth beans, mung beans, navy beans, pinto beans, rice beans, southern peas, tepary beans, sweet lupin, urd beans, wax beans, white lupin, white sweet lupin

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide /A as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water /A or with ground application equipment in a minimum of 10 gals. of water /A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues:

- Do not make more than 6 applications per crop of dry beans.
- Do not apply more than 1.0 lb product per acre (0.75 lbs a.i./A) per season.
- Do not make the last application within 7 days of harvest. (7-day PHI)



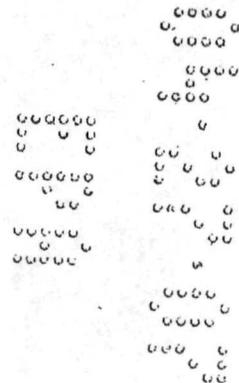
BEANS, SUCCLUENT -- LIMA BEANS ONLY

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide /A as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water/A, or apply with ground application equipment in a minimum of 10 gals. of water/A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues:

- Do not make more than 6 applications to one crop of lima beans.
- Do not apply more than 0.88 lb. (0.66 lb. active ingredient) to one crop.
- Do not make the last application within 7 days of harvest. (7-day PHI)



BRASSICA LEAFY VEGETABLES CROP GROUP*, ABYSSINIAN CABBAGE, SEAKALE CABBAGE, HANOVER SALAD, and TURNIP GREENS**

***Some of the crops in the *Brassica* Leafy Vegetables are: broccoli, broccoli raab (rapini), Brussels sprouts, cabbage, Chinese (bok choy) cabbage, Chinese broccoli, Chinese mustard cabbage (gai choy), Chinese (napa) cabbage, cauliflower, cavalo broccolo, collards, kale, kohlrabi, mizuna, mustard greens; mustard spinach, and rape greens**

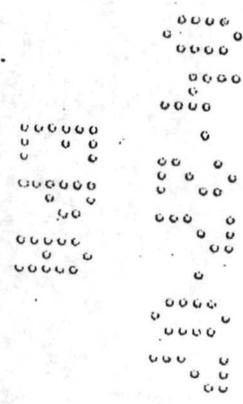
Note: ** Turnip Greens (tops, leaves) only: For use on turnip varieties grown for leaves only. Do not use on turnip varieties grown for roots or dual-purpose varieties grown for roots and leaves.

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide /A as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water /A, or with ground application equipment in a minimum of 10 gals. of water /A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues:

- Do not make more than 6 applications to one crop of *Brassica* leafy vegetables, Abyssinian cabbage, seakale cabbage, Hanover salad, or turnip greens.
- Do not apply more than 1.0 lb. (0.75 lb. a.i./A) of product per season.
- Do not make the last application within 7 days of harvest. (7-day PHI).



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BULB VEGETABLES CROP GROUP*

*Some of the crops in this group are: garlic, great-headed (elephant) garlic, leek, dry bulb onion, green onion, potato onion, tree onion, Welsh onion, rakkyo, and shallot.

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide per acre as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water /A or with ground application equipment in a minimum of 10 gals. of water /A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues:

- Do not make more than 6 applications to one crop of bulb vegetables.
- Do not make the last application within 7 days of harvest (or cutting). (7-day PHI)



CUCURBIT VEGETABLES CROP GROUP*

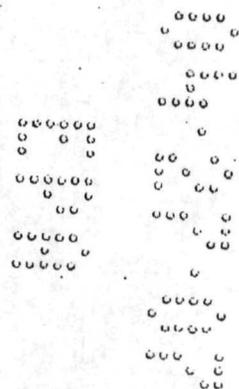
* Some of the crops in this group are: balsam pear (bitter melon), chayote (fruit), Chinese waxgourd (Chinese preserving melon), citron melon, cucumber, gherkin, edible gourds, melons (including hybrids: cantaloupe, casaba, crenshaw, honeydew melons, honey balls, mango melon, muskmelon, Persian melon), pumpkin, summer squash, winter squash, and watermelon (including hybrids).

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide /A as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water /A, or with ground application equipment in a minimum of 10 gals. of water /A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues

- Do not make more than 6 applications per growing season to cucurbits.
- Cucurbits may be harvested on the same day of the last application. (0-day PHI)



LEAFY VEGETABLES* (EXCEPT BRASSICA VEGETABLES) CROP GROUP

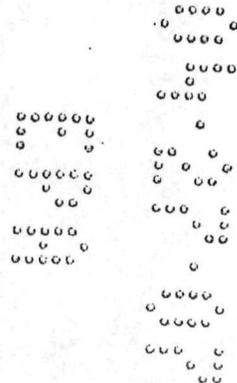
*Some of the crops in this group are: Amaranth, arugula, cardoon, celery, celtuce, chervil, Chinese celery, chrysanthemum (edible-leaved & garland), corn salad, cress (garden & upland), dandelion, dock, endive (escarole), Florence fennel (finocchio), lettuce (head & leaf), New Zealand spinach, orach, parsley, purslane (garden & winter), radicchio (red chicory), rhubarb, spinach, Swiss chard, and vine spinach

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide /A as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water /A, or with ground application equipment in a minimum of 10 gals. of water /A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues:

- Do not make more than 6 applications to one crop of celery or head lettuce.
- For all other leafy vegetable crops, do not make more than 5 applications per crop.
- Do not make the last application within 7 days of harvest. (7-day PHI)



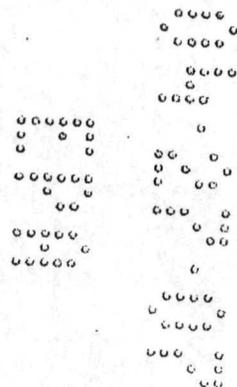
PEPPERS

For leafminer control:

- Apply 2.66 oz. (one packet) of Trigard Insecticide /A as a foliar spray when leafminers first appear.
- Apply with aircraft in a minimum of 5 gals. of water /A, or with ground application equipment in a minimum of 10 gals. of water /A, using sufficient carrier to achieve adequate coverage.
- Repeat application, as needed, at 7-day intervals to maintain control.

Notes: To avoid possible illegal residues:

- Do not make more than 6 applications to one crop of peppers.
- Peppers may be harvested on the same day of the last application. (0-day PHI)



POTATOES

For Colorado potato beetle control:

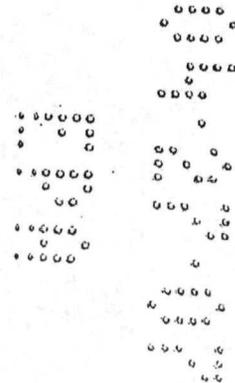
- Trigard Insecticide is an insect growth regulator and is most effective for control of first and second instar larvae of Colorado potato beetles. Although larger larvae can be affected, treatment of early instars will give best control. Affected larvae may remain on the plant for several days after treatment, but immediately stop feeding.
- Trigard Insecticide does not control adult beetles.
- Apply 2.66 oz. (one packet) or 5.32 oz. (two packets) per acre as a foliar spray. The first application should be made just after egg hatch to early instar larvae. If a second application for the same generation is needed, apply 2.66 oz. (one packet) or 5.32 oz. (two packets) per acre 7 to 14 days later.
- Apply with aircraft in a minimum of 5 gals. of water /A. With ground application equipment use a sufficient amount of water / to ensure thorough coverage of foliage.

For leafminer control:

- Apply 2.66 oz. (one packet) per acre as a foliar spray.
- Use sufficient water volume to ensure thorough coverage of foliage when using ground application equipment and a minimum of 5.0 gallons of water when applying with aircraft.
- Repeat application at 7-day intervals, as needed, to maintain good control.

Notes: To avoid possible illegal residues:

- Do not exceed a total of 1 lb. of Trigard Insecticide per acre during the growing season.
- Allow at least 7 days between applications.
- Do not make the last application within 7 days of harvest (7 day PHI).



ROTATIONAL CROPS

The following "plant-back intervals" must be observed when planting rotational crops after an application of Trigard Insecticide:

Rotational Crop	Planting Time From Last Application of Trigard Insecticide (Days)
All crops on the Trigard Insecticide label	0 days
Sweet corn, radishes, and cotton	30 days
Any other crop	300 days

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Do not use in animal feeds.

Storage

Store in a cool dry place. Do not store this product under wet conditions. Handle outer container carefully to avoid breakage of water-soluble packets.

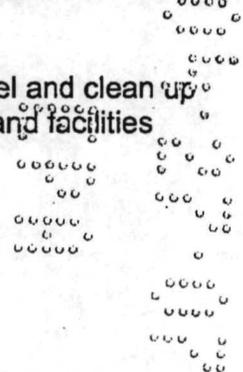
Pesticide Disposal

Waste resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal

Do not reuse outer container. Dispose of the empty outer foil pouch and outer container in the trash, as long as water-soluble packets are unbroken.

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.



(Non-detachable Container Label)

Trigard® Insecticide

GROUP 17 INSECTICIDE

For control of leafminers in Abyssinian and seakale cabbage, bulb vegetables, cucurbits, certain varieties of dried beans, Hanover salad, leafy vegetables including *Brassica*, succulent lima beans, peppers, tomatoes, turnip greens, and control of Colorado potato beetle and leafminer in potatoes

Active Ingredient:	
Cyromazine (CAS No. 66215-27-8)	
2,4,6-triamine	75.0%
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Other Ingredients:	25.0%
Total:	100.0%

Trigard Insecticide is a wettable powder.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements and directions for use in booklet.

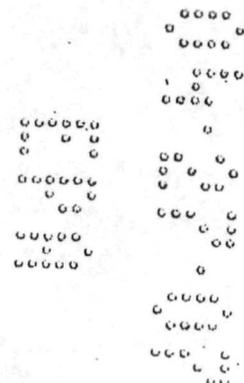
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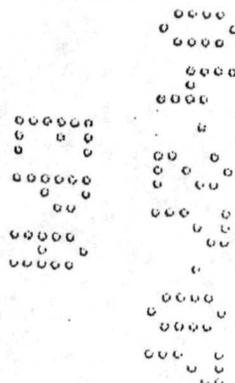
6 X 2.66 ounces
Water-Soluble Packets

15.96 ounces
Total Net Weight



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.



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

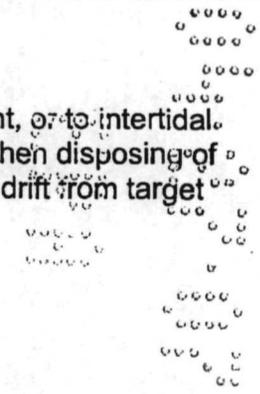
CAUTION

Causes moderate eye irritation. Harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

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 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.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have 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 person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER	
For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372	

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



Ground Water Advisory

A metabolite of Trigard Insecticide has been found in ground water, possibly 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.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Do not use in animal feeds.

Storage

Store in a cool dry place. Do not store this product under wet conditions. Handle outer container carefully to avoid breakage of water-soluble packets.

Pesticide Disposal

Waste resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal

Do not reuse outer container. Dispose of the empty outer foil pouch and outer container in the trash, as long as water-soluble packets are unbroken.

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.

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

Trigard®, the Syngenta logo, and the CP FRAME  are trademarks of a Syngenta Group Company

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

SCP 654A-L(draft)

Trigard 654A-L(draft) – pd – 04/25/07
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