

PM 21



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

APR 25 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

THERESA KAMICKER  
CIBA-GEIGY CORPORATION  
P.O. BOX 18300  
GREENSBORO, N.C. 27419

Subject: Label Amendment Submission of 9/15/93 In Response to PR Notice 93-7  
EPA Reg. No. 100-683  
APRON + CAPTAN FS

**IMPORTANT NOTICE:** This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**SERIOUS ERROR(S) ON SUBMITTED LABELING:**

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

**YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING.** Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

**YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.**

19/14



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director  
 Compliance Division, (7203)  
 Worker Protection Notification  
 Office of Compliance Monitoring  
 U.S. Environmental Protection Agency  
 401 M Street SW  
 Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:**

Submit the required notification. Then 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 as amended

**AND**

- WITHIN one year from date of this acceptance.

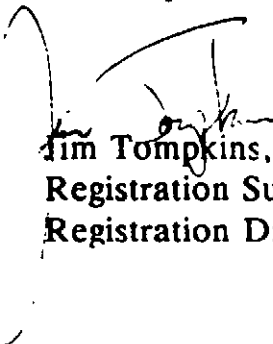
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)  
 Office of Pesticide Programs (7505C)  
 U.S. Environmental Protection Agency  
 401 M Street, SW  
 Washington, D.C. 20460-0001

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

WPS  
Front Panel of Booklet

APRON® + Captan FS

Fungicide Seed Protectant

An on-farm soybean seed treatment for protection against seed rots and certain diseases caused by Pythium and Phytophthora spp.

Active Ingredients:

Metalaxyl: N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester: .....	2.8%
*Captan: .....	13.7%
<u>Related Derivatives: .....</u>	<u>0.3%</u>
<u>Inert Ingredients: .....</u>	<u>83.2%</u>
Total:	100.0%

\*N-trichloromethylthio-4-cyclohexene-1,2-dicarboximide

Contains petroleum distillates

SHAKE WELL BEFORE USE

APRON + Captan FS contains 1.4 lbs. active ingredients per gallon

EPA Est. 100-NC-2  
EPA Reg. No. 100-683

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 detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements inside booklet.

See directions for use inside booklet.

60 Fl. Oz.  
U.S. Standard Measure

Ciba Plant Protection  
Ciba-Geigy Corporation  
Greensboro, NC 27419

CGA 92L1 049

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

APR 25 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 100-683

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.

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Conditions of Sale and Warranty

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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.

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.

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

General Information

APRON + Captan FS Fungicide Seed Protectant is a liquid fungicide for on-farm soybean seed treatment use in a planter box. APRON + Captan FS contains the active ingredients metalaxyl and captan. Metalaxyl is a systemic fungicide which controls Pythium damping-off and early season Phytophthora root rot. Captan protects the seed against seed and soil borne diseases such as seedling blights, damping-off and seed decay organisms which attack the germinating seed at planting.

APRON + Captan FS also contains molybdenum which aids in the nitrogen fixation process taking place in the root nodules. It is especially effective in low pH soils and soils with low phosphate levels.

## Soybeans

For control of Pythium damping-off, early season Phytophthora root rot and other seedling blights and decay organisms, apply 5 fl. ozs. of APRON + Captan FS per bushel of soybean seed.

**Application Instructions:** Empty half a bushel of seed into the planter box and pour one-half of the required amount of APRON + Captan FS (2.5 fl. oz.) evenly over the surface of the seed. Mix thoroughly by stirring with a paddle, stick, or auger until all the liquid is evenly distributed to the seed. Add the remaining seed and cover with the remaining 2.5 fl. ozs. of APRON + Captan FS. Stir until the seed is uniformly coated.

**Notes:** (1) Treated seed must not be used or mixed with food or animal feed, or processed for oil. (2) Treat only seed needed for immediate use, minimizing the interval between treatment and planting. (3) Do not store excess treated seed beyond planting time.

## Storage and Disposal

### Pesticide Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal, or cleaning of equipment. Open dumping is prohibited. Wastes resulting from the use of this product are toxic. Improper disposal of unused pesticide or rinsate is a violation of federal law. Pesticide 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 container (or equivalent), puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, keep out of smoke from burning containers.

For minor spills, 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**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing.

Statement of Practical Treatment

If in eyes: Hold eyelids open and flush with a steady, gentle stream of water. Call a physician if irritation occurs.

If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

If swallowed: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Call a physician or Poison Control Center.

Notes to Physician: If APRON + Captan FS is ingested, induce vomiting or lavage stomach. 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 (other than mixers and loaders) must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as barrier laminate or viton
- Shoes plus socks
- Protective eyewear

**Mixers and loaders must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or viton
- Shoes plus socks
- Protective eyewear
- Chemical-resistant apron when mixing and 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.

**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. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not clean equipment or dispose of equipment wash waters in a manner that will contaminate water resources. In the event that treated seeds are spilled and cannot be salvaged, completely cover them with soil.

**Physical and Chemical Hazards**

Do not use or store near heat or open flame.

Apron® trademark of Ciba-Geigy Corporation for metalaxyl  
U.S. Patent 4,151,299

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

[GANNONC.LABELA]APCAPFSW - 9/17/83

Container Label

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Fungicide Seed Protectant

An on-farm soybean seed treatment for protection against seed rots and certain diseases caused by Pythium and Phytophthora spp.

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Total:	100.0%

\*N-trichloromethylthio-4-cyclohexene-1,2-dicarboximide

SHAKE WELL BEFORE USE

APRON + Captan FS contains 1.4 lbs. active ingredients per gallon

EPA Est. 100-NC-2

EPA Reg. No. 100-683

See directions for use in attached booklet.

**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.

60 Fl. Oz.  
U.S. Standard Measure

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Ciba Plant Protection  
Ciba-Geigy Corporation  
Greensboro, NC 27419

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