

PM 21 100 718

file 1 of 12



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

JAN 14 1994

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 08/06/93 in Response to PR Notice 93-7
EPA REG. NO. 100-718
SUBDUE & WPS TURF FUNGICIDE

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. 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:

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.



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

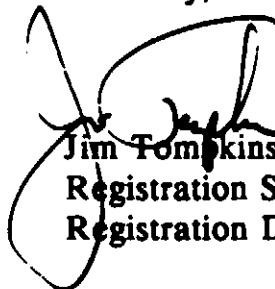
Submit the final printed labeling via the U.S. Postal Service to:

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 printed 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

WPS

coursePak™

Subdue® + WSP

Turf Fungicide

For control of certain
diseases in turf

ACCEPTED
with COMMENTS
In EPA Letter Dated
4 1994

Under the Federal Insecticide,
Fungicide and Rodenticide Act
as amended, this pesticide
registered under EPA Reg. No.
100-718

Active Ingredient:

Metalaxyl: N-(2,6-dimethylphenyl)-N-
(methoxyacetyl) alanine methyl ester 25.0%

Inert Ingredients: 75.0%

Total: 100.0%

Subdue + WSP is a wettable powder
packaged in a water soluble bag.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional directions for use and precautionary statements
on back of carton.

EPA Reg. No. 100-718

EPA Est. 10163-AZ-1

This outer protective carton contains Subdue + WSP in an inner
water soluble bag. Entire inner bag and contents dissolve in
water. After opening outer carton, immediately dump entire
unopened inner bag into the partially filled sprayer or mix
tank. Do not handle the soluble bag or expose it to moisture,
since this may cause rupturing.

1 lb. 4 oz.
Net Weight

CGA 115L1 042

Ciba-Geigy

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.

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
- Shoes plus socks

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.

Do not enter treated areas without protective clothing until sprays have dried.

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

General Information

Subdue + WSP is a systemic fungicide use for control of Pythium blight (P. aphanidermatum, P. ultimum) and downy mildew (Sclerophthora macrospora) on turf.

NOTE: Subdue + WSP is a systemic fungicide having a specific mode of action. Use of Subdue + WSP could result in development of resistant strains of fungi. Development of resistance cannot be predicted. Therefore, Ciba-Geigy cannot assume liability for turf damage resulting from resistant strains of fungi. Consult with your State Agricultural Experiment Station or Extension Service Specialist for guidance and ways to control any possible Subdue + WSP resistant strains of fungi which may occur.

Mixing Instructions

Prepare no more spray mixture than is required 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 Subdue + WSP thoroughly mixed and in suspension. Flush spray tank thoroughly with water daily after use and dispose of pesticide rinsate by application to an already treated area.

Note: Do not use with oils or adjuvants.

Subdue + WSP 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 bags of Subdue + WSP into the tank. Continue agitation while adding the remainder of the water.

Subdue + WSP + Tank Mixtures: 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 bags of Subdue + WSP into the tank. Then add the desired amount of the selected tank mix partner(s) which are registered for use on turf. Continue agitation while adding the remainder of the water.

Precaution: Soluble bags of Subdue + WSP must be dissolved completely in water before any other tank mix partner, including micronutrients or other liquid or dry fertilizers, is added to the spray solution.

If using Subdue + WSP in a tank mixture, observe all directions for use, crops/sites, use rates, dilution ratios, precautions, and limitations which appear on the tank mix product label. No label dosage rate should be exceeded and the most restrictive label precautions and limitations should be followed. This product should not be mixed with any product which prohibits such mixing. Tank mixtures are permitted only in those states where the tank mix product is registered.

Application Through Irrigation Systems

Overhead Irrigation Application: Subdue + WSP alone or in tank mixture with other pesticides which are registered for overhead application may be applied in irrigation water at rates recommended on this label. Apply this product only through an overhead irrigation system. Do not apply this product through any other type of irrigation system. Turf injury or lack of effectiveness can result from nonuniform distribution of treated water. If you have questions about calibration, you should contact State Extension specialists, equipment manufacturers or other experts. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place. A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Operation Instructions

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water-source contamination from backflow.

2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Do not apply when wind speed favors drift beyond the area intended for treatment. Avoid spray overlap as turf injury may result.
8. Prepare a mixture with a minimum of 5 gals. of water to one soluble bag of Subdue + WSP and inject this mixture into the system. Injecting a larger volume of a more dilute mixture per hour will usually provide more accurate calibration of metering equipment. Maintain sufficient agitation to keep the fungicide in suspension.
9. Meter into irrigation water during the beginning of the irrigation cycle.

Precaution for irrigation applications: Where distribution patterns do not overlap sufficiently, unacceptable control may result. Where distribution patterns overlap excessively, injury to turf may result.

Turf

<p>Established Turf</p> <p>Pythium Blight Yellow Tuft Downy Mildew</p>	<p>Apply as a preventative treatment. Use 1 bag of Subdue + WSP per 20,000 sq. ft. on a 10-14 day schedule or 1 bag of Subdue + WSP per 10,000 sq. ft. on a 14-21 day schedule. Apply in 3-5 gallons of water per 1,000 sq. ft. During periods of severe disease pressure, use 1 bag per 10,000 sq. ft. every 14 days.</p>
<p>Newly Seeded Areas</p> <p>Pythium Damping Off Pythium Blight Yellow Tuft Downy Mildew</p>	<p>Apply as a preventative treatment. Use 1 bag of Subdue + WSP per 20,000 sq. ft. soon after seeding. Apply in 5-10 gallons of water per 1,000 sq. ft. In areas where disease pressure is severe, use 1 bag of Subdue + WSP per 10,000 sq. ft. Irrigate after application with 1/4 inch water. Retreat at 7-14 day intervals while conditions remain favorable for disease.</p>

To minimize the potential for resistance, (1) Make no more than three applications of Subdue + WSP per season and (2) Apply an EPA-registered fungicide not containing metalaxyl for Pythium control at least once during the season.

Storage and Disposal

Storage - Store in a cool, dry place. Do not store this product under wet conditions. When stored at temperatures less than 50°F, handle outer carton carefully to avoid breakage of inner soluble bags.

Pesticide 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, 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 by open burning, if allowed by state and local authorities. If burned, keep out of smoke.

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 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

CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Causes eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing dust or spray mist.

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. Get medical attention.

If inhaled: Remove victim to fresh air. Get medical attention.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes 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 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

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.

Physical and Chemical Hazards

Do not use or store near heat or open flame.

coursePak™ trademark of Ciba-Geigy Corporation
Subdue® trademark of Ciba-Geigy Corporation for metalaxyl
U.S. Patent No. 4,151,299

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

CGA 115L1 042	Initial Registration	April 6, 1992
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		(WPS)

[GANNONC.LABELS]SUBDTFWP - 8/3/93