

100-795

9/25/2009

1/27



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 25 2009

Ms. Pat Dinnen
Product Registration
Syngenta Crop Protection
P.O. Box 18300
Greensboro, NC 27419

Subject: Label Notification for Pesticide Registration Notice 2007-4
(Storage & Disposal Changes)

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated September 4, 2009 for:

EPA Reg, 100-795 "SUBDUE WSP FUNGICIDE"

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

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

<p style="margin: 0;">United States Environmental Protection Agency Washington, DC 20460</p>	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <hr/> Notification
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Application for Pesticide - Section I

1. Company/Product Number 100-795	2. EPA Product Manager Mary Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Subdue WSP	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Syngenta Crop Protection, Inc. P. O. Box 18300 Greensboro, NC 27419 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION SEP 25 2009
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For Section I and Section II.).

Notification of label change per PR Notice 2007-4. This Notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Syngenta is amending the Storage and Disposal section of the label by Notification according to the directions stated in PR Notice 2007-4.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
*Certification must be submitted		If "Yes" No. per Unit Packaging wgt. Container	If "Yes" No. per Unit Packaging wgt. container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 5 lb.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other <u>Pressure Sensitive</u> <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Pat Dinnen	Title Label Group Leader	Telephone No. (include Area Code) 336-352-2494
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Pat Dinnen</i>	3. Title Regulatory Specialist	
4. Typed Name Pat Dinnen	5. Date September 4, 2009	

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Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419-8300
www.syngenta.com



FedEx

September 4, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Ms. Linda Arrington

**SUBJECT: SUBDUE® WSP
EPA REG. NO. 100-795
NOTIFICATION OF LABEL CHANGE PER PR NOTICE 2007-4**

Syngenta Crop Protection, Inc. is submitting Notification for Subdue WSP, EPA Reg. No. 100-795. Syngenta is amending the Storage and Disposal section of the label by Notification according to the directions stated in PR Notice 2007-4.

Attached are:

- One copy of the label with the changes clearly marked
- One unmarked copy of the label
- A CD of the unmarked copy of the label for "Electronic Comparison and Review"
- Certificate with Respect to Label Integrity Form
- Completed EPA Form 8570-1

Thank you in advance for approving this Notification. If you have any questions, please contact me at 336-632-2494.

Sincerely,

Pat Dinnen
Label Group Leader
Regulatory Affairs

Enclosures

Certification with Respect to Label Integrity

Version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
100-795	9/4/2009	000100-00795.20090904.SUBDUE-WSP_PRN2007-4_SEP2009.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Pat Dinnen

Signature

September 4, 2009

Date

Pat Dinnen

Name (typed)

Label Group Leader

Title

5/27

NOTIFICATION

SEP 25 2009

**Subdue® WSP
Fungicide**

For the control of certain diseases in conifers, nonbearing citrus, nonbearing deciduous fruits and nuts, ornamentals, and turf

Active Ingredient:

Mefenoxam*45.0%

Other Ingredients:55.0%

Total:100.0%

*CAS Nos. 70630-17-0 and 69516-34-3

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.

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 statement on back of carton.

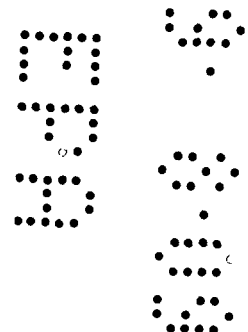
EPA Reg. No. 100-795
EPA Est. 67545-AZ-1

Product of Switzerland.
Formulated in the USA.

SCP 795B-L3E 0309 [Product ID 17679]

16 x 5 ounces
Water-Soluble Packets

5 pounds
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p>HOT LINE NUMBER</p> <p>For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

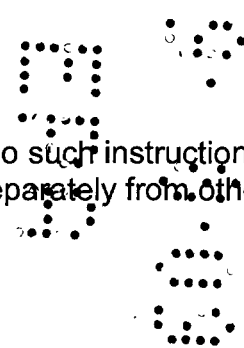
Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Harmful if swallowed or absorbed through skin.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- 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 apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

Groundwater Advisory Statement

This chemical is known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

Physical or Chemical Hazards

Do not use, pour, spill, or store near heat or open flame.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, INC. or Seller. To the extent permitted by applicable law, Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of the product contrary to label instructions or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and, (2) Buyer and User assume the risk of any such use. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.**

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

DIRECTIONS FOR USE

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

Subdue WSP must be used only in accordance with the directions on this label or on EPA approved supplemental 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); notification to workers, 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 48 hours. Exception: If the product is soil injected, soil incorporated, or applied by soil drenching, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated. There is no restricted-entry interval (REI) requirement following soil injection, soil incorporation, or a soil drench application.

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 over long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Socks and chemical-resistant footwear

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 or allow others to enter without footwear until sprays have dried.

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

GENERAL INFORMATION

Subdue WSP is a systemic fungicide for use on ornamentals; turf; nonbearing citrus grown in nurseries and as landscape plantings; conifers grown in nurseries and plantations, including Christmas trees; and nonbearing deciduous fruit and nut trees grown in nurseries.

Notes: (1) Subdue WSP is a systemic fungicide having a specific mode of action. Use of Subdue WSP could result in development of insensitive strains of fungi. Development of insensitivity cannot be predicted. Therefore, Syngenta cannot assume liability for crop damage resulting from insensitive strains of fungi. Consult with your State Agricultural Experiment Station or Extension Service Specialist for guidance and ways to control any possible Subdue WSP insensitive strains of fungi which may occur. (2) To help decrease the chance of downy mildew insensitivity, do not use Subdue WSP for control of downy mildew diseases, except for use in turf. Use Subdue WSP only as a soil application for control of soil-borne diseases.

Maximum usage when applying both metalaxyl and mefenoxam containing products to the same crop within the same season: Do not apply more than the maximum seasonal total for the active ingredient as stated on the label of the product containing the lowest seasonal total on that crop.

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

Mixing Instructions

Prepare no more spray mixture than is required for the immediate operation. Thoroughly clean spray equipment before using this product. Vigorous agitation is necessary to dissolve the bag and disperse the product. Maintain maximum agitation throughout the spraying operation. **Do not let the spray mixture stand overnight in the spray tank. Flush the spray equipment thoroughly following each use and apply the rinsate to a previously treated area.**

*Precautions: (1) Water-soluble bags of Subdue WSP must be completely dissolved and dispersed in **plain** water before any other tank mix partner, including micronutrients or other liquid or dry fertilizers, are added to the spray solution. Boron, especially in the form of a micronutrient additive, such as Solubor®, etc., or as a natural component of the mix water, may prevent water-soluble bags from dissolving. (2) When the spray carrier contains more than 10% soluble or liquid fertilizers by volume, soluble bags of Subdue WSP must be slurried in water following the procedure as outlined in **Subdue WSP in Fertilizer Solutions**. (3) Products packaged in water-soluble bags must be the first materials placed into the mix water.*

Subdue WSP Alone: Add ¼ of the required amount of plain water to the spray or mixing tank. With the agitator running, drop the required number of **unopened** soluble bags of Subdue WSP in the tank all at once. Continue agitation while adding the remainder of the water. Begin application of the spray solution after the bags have dissolved and the material has completely dispersed into the mix water. Maintain agitation until all the mixture has been applied.

Subdue WSP + Tank Mixtures: Subdue WSP is usually compatible with Heritage®, Banner MAXX®, and Daconil®. Add ¼ of the required amount of plain water to the spray or mixing tank. With the agitator running, drop the required number of **unopened** soluble bags of Subdue WSP and any other products packaged in water-soluble bags, into the tank all at once. After the water-soluble bags have dissolved and the products have dispersed uniformly into the mix water, continue to fill the tank with water. Then add the desired amount of the tank mix partner(s) which are registered for use on turf and allow them to completely disperse. Continue agitation to maintain a uniform suspension until all of the spray solution has been applied.

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.**

Subdue WSP in Fertilizer Solutions: Slurry Subdue WSP in water. Add a maximum of 4 unopened soluble bags of Subdue WSP to 5 gallons of clean water. Stir the

solution until all of the soluble bag material has dissolved and the Subdue WSP has formed a smooth slurry.

Add 1/3 of the required amount of water and/or liquid fertilizer to the spray or mixing tank. With the agitator running, add the Subdue WSP slurry. If adding other tank mix partners, add the products in the following order: Subdue WSP slurry, wettable powders or dispersible granules, and then emulsifiable concentrates. Allow each product to disperse before adding the next one, maintaining agitation the whole time. Triple rinse the slurry container and add to the spray tank. Add the remainder of the water and/or fertilizer and continue agitation. Maintain agitation until all of the mixture has been applied.

APPLICATION INSTRUCTIONS

For banded applications, calculate the amount of Subdue WSP needed as follows:

$$\frac{\text{band width in inches}}{\text{row width in inches}} \times \text{broadcast rate per acre} = \text{amount needed per acre}$$

Application Through Irrigation Systems

Subdue WSP alone or in tank mixture with other pesticides registered for application through irrigation systems may be applied in irrigation water at rates recommended on this label. This product may be applied through micro sprinkler or drip irrigation systems. Do not apply this product through any other type of irrigation system. Plant injury or lack of effectiveness may result from nonuniform distribution of treated water. If you have questions about calibration, you should contact State Extension Service 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 label-prescribed safety devices for public water supplies are in place. A person knowledgeable of the chemigation system and responsible for its operation shall shut the system down and make necessary adjustments should the need arise.

Dilute Subdue WSP with water in the solution tank at a ratio of at least 1 part Subdue WSP to 15 parts water. Liquid fertilizer may replace all or part of the water. If diluted in liquid fertilizer, the pH level must be less than 7.5. Inject Subdue WSP solution at a ratio of 50:1 or greater. Injecting a larger volume of a more dilute mixture will usually allow a more accurate calibration of the metering equipment. Meter the fungicide into the irrigation water during the first part 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.

Safety Devices for Irrigation Systems Connected to Public Water Supplies

If the source of water for your irrigation system is a public water supply, follow the instructions below.

1. Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.
2. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.
3. The pesticide injection pipeline must contain a functional, automatic, quick-closing check-valve to prevent the flow of fluid back toward the injection pump.
4. The pesticide injection pipeline must 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.
5. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, 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.

Safety Devices for Irrigation Systems Not Connected to a Public Water Supply

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 the 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.

Calibration and Application Techniques

Subdue WSP must be applied on the schedule specified in the use recommendations, not according to the irrigation schedule.

The following calibration and application techniques are provided for user reference, but do not constitute a warranty of fitness for application through sprinkler irrigation equipment. Users should check with state and local regulatory agencies for potential use restrictions before applying any agricultural chemical through sprinkler irrigation equipment.

General Instructions

1. Each run of the irrigation system must be calibrated separately to determine the time it takes water to move through the system and to make sure all emitters in the system are putting out the same amount of water.
2. Only pressure injection or venturi equipment is recommended.
3. Determine the area to be treated in each irrigation run.
4. Measure the output of each of the emitters or drip tubes closest to and farthest from the injector site.
5. For calibration, substitute a concentrated detergent (such as Wisk) for the Subdue WSP in the injector tank. It is important to use the same volume of soap solution as the planned volume of Subdue WSP solution when calibrating the system. The detergent will bubble as it leaves the emitters. The time period over which bubbles occur should be checked for both the closest and farthest emitters. If these times are not within 2 minutes of each other, adjust the dilution ratio and/or the injection rate.

Step-by-Step Instructions

1. Before starting to calibrate, operate the system until all the emitters are putting out at equal flow rates or until the system is operating at full pressure.
2. Make up an indicator solution of detergent or fertilizer, using the same ratio to be used with mixing Subdue WSP.
3. Set the injector to apply the indicator solution at the injection rate to be used in the actual Subdue WSP application.
4. Attach a 5-inch length of flexible tubing over the emitter closest to the injection point, another length over the emitter farthest away. Both emitters should be monitored to determine the time intervals that the indicator solutions are observed.
5. Begin injecting the indicator solution. Direct the flow from the tubes at the emitters into a small container. Begin timing when the indicator solution is first detected, stop timing when the indicator solutions are no longer detected.
6. If the period of detection of the indicator solution between the 2 emitters are within 2 minutes of each other, comparable coverage will be obtained. If they are not, make adjustments by increasing the dilution ratio, using more water per part of Subdue WSP, or adjust the injector to a slower flow rate.

7. Once the system is calibrated, dilute the needed amount of Subdue WSP with water using a minimum of 15 parts water to 1 part Subdue WSP in the solution tank.
8. Do not begin to inject Subdue WSP into the system until all emitters are producing equal flow rates, or until the system is at full pressure.
9. Inject the Subdue WSP into the system at the beginning of the irrigation set in ½-1 inch of irrigation water.

ORNAMENTALS

Use Subdue WSP on container, bench, or bed-grown ornamentals in greenhouses or outdoor nurseries, and for use on ornamentals grown for indoor and outdoor landscaping, for control of damping-off, and root and stem rot diseases caused by Pythium and Phytophthora. Subdue WSP may be applied through irrigation systems, as a soil drench at the time of seeding, transplanting, or to established plants. **Within a rate range given for a specific group of ornamentals, use the lower rate for the shortest interval listed and the higher rate for the longest interval. Under severe disease conditions, use the highest rate and the shortest interval.**

For drench applications, use enough of the specified Subdue WSP water solution to wet the root zone of plants. In general, 1 pt./sq. ft. of this solution is sufficient for ornamentals growing in containers with 4 inches of growth media. Containers with growth media depth greater than 4 inches generally require 1½-2 pts./sq. ft. of the solution.

NOTICE TO USER: Due to the large number of species and varieties of ornamentals and nursery plants, it is impossible to test every one for tolerance to Subdue WSP. Neither the manufacturer nor the seller has determined whether or not Subdue WSP can be used safely on ornamental and nursery plants not specified on this label. The professional user should determine if Subdue WSP can be used safely prior to commercial use. In a small area, test the recommended rates for a particular group of unlabeled plants, i.e., bedding plants, foliage, etc., for phytotoxicity prior to widespread use.

Foliage Plants

Aglaonema
Aphelandra
Dieffenbachia
Peperomia
Philodendron*
Pothos**
Schefflera
Sedum
Sempervivum
Zygocactus

DRENCH: Mix 0.175-0.35 oz. with 100 gals. of water or 1 packet per 2860-1430 gallons of water. Apply 1 pt. solution per sq. ft to the soil surface. For growth media depth greater than 4 inches, apply 1½-2 pts. solution per sq. ft. to the soil surface. Repeat applications at 2 to 3-month intervals, if necessary.

*On Philodendron, use 0.25-0.50 oz./100 gals or 1 packet per 2000-1000 gallons of water.

***Precaution: To minimize the potential for injury to Pothos, do not use more than 0.20 oz./100 gals. and do not apply more frequently than once every 3 months.*

Bedding Plants

Ageratum
Algerian ivy
Artemisia
Aster
Begonia
Caladium
Carnation
Chrysanthemum
Coleus
Daisy
English ivy
Foxglove
Gaillardia
Geranium
Impatiens
Marigold
Pansy
Petunia
Phlox
Pinks
Primrose
Prostrate Rosemary
Salvia
Snapdragon
Verbena
Vinca
Zinnia

DRENCH At Transplanting (Soil 2-3 inches deep): Mix 0.25-0.50 oz. with 100 gals. of water (1 packet per 2000-1000 gallons of water) and apply 1 pt. solution per sq. ft. to the soil surface. For growth media depth greater than 4 inches, apply 1½-2 pts. solution per sq. ft. to the soil surface. Repeat applications at 1 to 2-month intervals, if necessary. Do not apply rates of 0.40-0.50 oz./100 gals. (1 packet per 1250-1000 gallons of water) more often than once every 6 weeks.

<p>Flowers</p> <p>African violet Anthurium Baby's breath Carnation Chrysanthemum Columbine Delphinium Easter lily* Geranium Gloxinia Poinsettia Rose</p>	<p>DRENCH: Mix 0.25-0.50 oz. with 100 gals. of water (1 packet per 2000-1000 gallons of water) and apply 1 pt. solution per sq. ft. to the soil surface. For growth media depth greater than 4 inches, apply 1½-2 pts. solution per sq. ft. to the soil surface. Repeat applications at 1 to 2-month intervals, if necessary. Do not apply rates of 0.40-0.50 oz./100 gals. (1 packet per 1250-1000 gallons of water) more often than every 6 weeks.</p> <p><i>*Precaution: Do not apply more than 0.28 oz./100 gals. water (1 packet per 1785 gallons of water) to Easter lily and only make one at-planting application.</i></p>
<p>Azaleas</p>	<p>DRENCH: Phytophthora root and crown rot Mix 0.175-0.35 oz. with 100 gals. of water (1 packet per 2860-1430 gallons of water) and apply 1 pt. solution per sq. ft. to the soil surface. For growth media depth greater than 4 inches, apply 1½-2 pts. solution per sq. ft. to the soil surface. Repeat applications at 2 to 4-month intervals, if necessary.</p> <p><i>Precautions: (1) To minimize the potential for injury to azaleas, do not apply repeat soil applications of 0.35 oz./100 gals. (1 packet per 1430 gallons of water) closer than every 3 months, and do not exceed a total of 0.50 oz per 100 gallons. (1 packet per 1000 gallons of water) in 6 months. (2) Use the lower rate for "Coral Bell" variety.</i></p>

<p>Woody Ornamentals Other Than Azaleas</p> <p><i>Aucuba japonica</i> Arborvitae Boxwood Ceanothus Cotoneaster Dogwood Ficus "Halls" Honeysuckle Ilex <i>Juniperus</i> spp. Photinia <i>Pieris japonica</i> <i>Pinus</i> spp. Pittosporum Rhododendron White cedar White pine Yew</p>	<p>DRENCH: Mix 0.50-1 oz. with 100 gals. (1 packet per 1000-500 gallons of water) of water and apply 1 pt. solution per sq. ft. to the soil surface. For growth media depth greater than 4 inches, apply 1½-2 pts. solution per sq. ft. to the soil surface. Repeat applications at 2 to 3-month intervals, if necessary. Do not apply rates of 0.85 oz./100 gals. (1 packet per 590 gallons of water) more often than every 10 weeks.</p>
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CITRUS IN NURSERIES AND LANDSCAPE PLANTINGS (NONBEARING)

Use Subdue WSP on nonbearing citrus for control of citrus foot rot, root rot, and trunk canker caused by *Phytophthora* spp. Apply to the soil as a drench or as a soil spray in a banded application.

Make the first application of Subdue WSP at the time of planting. Make repeat applications at 3-month intervals during the period when trees are actively growing.

Soil Drench: Mix 1.1-1.7 oz./100 gals. or 1 packet per 455-295 gallons of water and apply as a drench to the soil at the rate of 100-250 gals./1,000 ft. of row. The width of the drench treatment should be wide enough to cover the root systems of the plants.

Soil Surface Spray: Apply 4.65 lbs./A (15 packets/A) in a broadcast or banded surface spray to seedbeds, liners, or bedded stock in sufficient water to obtain uniform coverage. If applications are banded, the treated area should be wide enough to cover the root systems of the plants. Follow with a ½ inch irrigation if rainfall is not expected within 24 hours.

Calculate the amount of Subdue WSP needed for a banded treatment by using the formula at the end of the **General Information** section of this label.

Note: Do not use in greenhouse citrus nursery stock intended for commercial fruit production.

CONIFERS IN NURSERIES AND PLANTATIONS (INCLUDING CHRISTMAS TREES)

Subdue WSP provides control of Phytophthora root rot of conifers.

Conifers in Nurseries

<p>Seedbeds and Plug-Plantings</p>	<p>Soil Surface Application: Apply 15 oz. Subdue WSP per acre (3 packets per acre) in at least 50 gals. of water in the spring and again in the fall. Follow with a ½ -1 inch irrigation if rainfall is not expected within 24 hours.</p>
<p>2-0 Transplants</p>	<p>Soil Surface Application: Apply 15-30 oz. Subdue WSP per acre (3-6 packets per acre) in at least 50 gals. of water in the spring and again in the fall. Follow with a ½ -1 inch irrigation if rainfall is not expected within 24 hours.</p>

Conifers in Plantations

Use of Subdue WSP will aid in the control of Phytophthora root rot when used in conjunction with good cultural practices. The use of Subdue WSP will not overcome poor management practices such as planting on sites that are prone to flooding or are poorly drained. Subdue WSP fungicide will not revitalize trees showing moderate to severe disease symptoms.

Soil Surface Application: Apply 1-5 lbs.(3-16 packets per acre) of Subdue WSP per acre in a minimum of 50 gals. of water as a directed soil spray. Do not apply as a foliar spray. Applications should be made in early spring before growth starts and in the fall before the ground freezes. Calculate the amount of Subdue WSP needed for a banded treatment by using the formula at the end of the **General Information** section of the label.

For best results, apply ½-1 inch of water after application if rain is not expected within 24 hours.

DECIDUOUS FRUITS AND NUTS IN NURSERIES (NONBEARING)

Subdue WSP provides control of Pythium root rot and Phytophthora root, crown, and collar rot of nonbearing deciduous fruits and nuts.

Soil Surface Application: Apply 1.7 oz./1,000 sq. ft. (1 packet per 2950 sq. ft.) in sufficient water to obtain thorough coverage of the soil under the canopy of the trees. Treat sufficient surface area in nurseries to cover the root zone of the plants. Do not apply as a foliar spray. Follow with a ½-1 inch irrigation if rainfall is not expected within 24 hours. Additional applications may be made as necessary at 3-month intervals during the growing season.

Notes: (1) Do not apply to trees that will bear harvestable fruit within 12 months of the last application, or possible illegal residues may result. (2) Do not apply more than 4.4 oz./1,000 sq. ft. (1 packet per 1135 sq. ft.) of Subdue WSP per year.

TURF

Subdue WSP controls Pythium blight and Pythium damping-off in turf, yellow tuft (downy mildew) in bluegrass, and downy mildew in St. Augustinegrass. **Within the rate range given for turf, use the lower rate for the shortest interval listed and the higher rate for the longest interval. Under severe disease conditions, use the highest rate and shortest interval.**

<p>Established Turf</p> <p>Pythium Blight Yellow Tuft Downy Mildew</p>	<p>Foliar Application: Apply as a preventative treatment at 0.28-0.56 oz. in 1-5 gals. of water per 1,000 sq. ft. (1 packet per 0.40-0.20 acres). Re-treat at 10 to 21-day intervals. During periods of prolonged conditions favorable for disease development, use 0.28-0.56 oz. per 1000 sq ft (1 packet per 0.40-0.20 acres) on a 14-day schedule.</p>
<p>Newly Seeded Areas</p> <p>Pythium Damping-off Pythium Blight Yellow Tuft Downy Mildew</p>	<p>Soil Surface Application: Apply 0.28-0.56 oz. in 1-5 gals. of water per 1,000 sq. ft. (1 packet per 0.40-0.20 acres) immediately after seeding. Irrigate after application with ¼ inch water. Re-treat at 7 to 14-day intervals if conditions remain favorable for disease.</p> <p>Note: For long-term control of Pythium in areas when using seed treated with the active ingredient contained in Subdue, make an application of Subdue WSP 7-10 days after seeding.</p>

Note: For control of other diseases of turf, use Banner MAXX alone or in a tank mix combination with Subdue WSP. Refer to the Banner MAXX label for rates, precautions, restrictions, etc.

Precautions: To minimize the potential for insensitivity, (1) Make no more than 3 applications per season of any product in which the Subdue active ingredient is applied alone, and (2) Apply an alternate EPA-registered fungicide for Pythium control at least once during the season.

Rotational Crops

Do not plant any crop which is not registered for use with the Subdue active ingredient in soil treated with this active ingredient for a period of 12 months.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage

Store in a cool, dry place. Do not store this product under wet conditions. Handle outer packaging carefully to avoid breakage of inner soluble bags.

Pesticide Disposal

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/Handling

Non-refillable container. Do not reuse or refill this container or outer carton. Offer for recycling if available or dispose of the empty outer foil pouch in the trash as long as WSP is unbroken carton in a sanitary landfill, or by alternatives allowed by state and local authorities.

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.

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Solubor® trademark of United States Borax and Chemical Corporation

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Manufactured for:
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, North Carolina 27419-8300

SCP 795B-L3E 0309

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NON-DETACHABLE CONTAINER LABEL

**Subdue® WSP
Fungicide**

For the control of certain diseases in conifers, nonbearing citrus, nonbearing deciduous fruits and nuts, ornamentals, and turf

Active Ingredient:	
Mefenoxam*	45.0%
Other Ingredients:	55.0%
Total:	100.0%

*CAS Nos. 70630-17-0 and 69516-34-3

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

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.

EPA Reg. No. 100-795
EPA Est. 67545-AZ-1

KEEP OUT OF REACH OF CHILDREN.

CAUTION

Product of Switzerland
Formulated in the USA

SCP 795B-L3E 0309

16 x 5 ounces
Water-Soluble Packets

5 pounds
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.
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. Avoid contact with skin, eyes or clothing. Harmful if swallowed or absorbed through skin.

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 apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

Physical or Chemical Hazards

Do not use, pour, spill, or store near heat or open flame.

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CHEMIGATION: See attached booklet for use directions for chemigation. Do not apply this product through any irrigation systems, unless the labeling on chemigation is followed.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage

Store in a cool, dry place. Do not store this product under wet conditions. Handle outer packaging carefully to avoid breakage of inner soluble bags.

Pesticide Disposal

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.

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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.

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Manufactured for:
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Greensboro, North Carolina 27419-8300

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