

100-797 	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number NOTIFICATION
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**Application for Pesticide - Section I**

1. Company/Product Number 100-797	2. EPA Product Manager Mary Waller	3. Proposed Classification  <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Apron XL™ WS Fungicide Seed Treatment	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. <b>Expedited Review.</b> 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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<div style="text-align: right;"><b>NOTIFICATION</b></div> <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <b>JUL 27 2001</b> <input type="checkbox"/> Other - Explain below.
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**Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**  
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of 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 this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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. The following changes are being made via this notification: 1) Company name and address have been updated to reflect Syngenta Crop Protection, Inc. 2) The Conditions of Sale and Warranty statement has been changed to reflect the name change. Because Syngenta has been formed by the merger of Novartis Crop Protection, Inc. and Zeneca Ag Products, we have chosen to use the former Zeneca warranty statement as the Syngenta warranty statement. No other changes occur in the statement other than the name change. 3) The copyright date reflects Syngenta. 4) Trademark statements have been updated to reflect Syngenta for those products for which Syngenta holds the trademark. 5) The Internet address has been changed to reflect Syngenta. 6) Other places in the label which referring to the company name have been updated.

**Section - III**

1. <b>Material This Product Will Be Packaged In:</b>				2. <b>Type of Container</b>	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input 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 type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input 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 type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section - IV**

1. <b>Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)</b>		
Name Nan S. Padgett	Title Label Group Leader	Telephone No. (Include Area Code) 336-632-7567
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 	3. Title Label Group Leader	
4. Typed Name Nan S. Padgett	5. Date July 13, 2001	

NOIFICATION  
JUL 27 2001



# Apron XL™ WS

## FUNGICIDE

A seed treatment chemical for control of *Pythium* and *Phytophthora* causing damping-off, seed rot, and systemic downy mildew diseases of certain crops

**Active Ingredients:**

(R)-2-[(2,6-dimethylphenyl)-methoxyacetyl-amino]-propionic acid methyl ester .....	43.6%
Related Compounds .....	1.4%

**Other Ingredients:** 55.0%

**Total:** 100.0%

Apron XL WS is a wettable powder packaged in a water-soluble bag.

EPA Reg. No. 100-797

EPA Est. 67545-AZ-1

**KEEP OUT OF REACH OF CHILDREN.**

## CAUTION

See additional precautionary statements and directions for use inside booklet.

This outer protective container contains Apron XL WS in an inner water-soluble bag. Entire inner bag and contents dissolve in water. After opening outer container, immediately drop 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.

**ONE POUND**  
**NET WEIGHT**



**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 should 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. All such risks shall be assumed by Buyer and User, and 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. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and Buyer and User assume the risk of any such use. SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

In no event shall SYNGENTA or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **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 limitations of warranty and of 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.

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 48 hours.** Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, 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.

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

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

**GENERAL INFORMATION**

Apron XL WS is a systemic fungicide seed dressing specifically for control of systemic downy mildews and diseases caused by soil-borne *Pythium* and *Phytophthora* spp. When a rate range is specified, use higher rates of Apron XL WS when the disease pressure is expected to be high.

For control of other soil-borne diseases, such as *Rhizoctonia* spp., Apron XL WS should be applied in combination with other registered seed dressing fungicides.

**Note:** Apron XL WS is a systemic fungicide having a specific mode of action. Apron XL WS could be subject to 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 Apron XL WS insensitive strains of fungi which may occur.

## Apron XL™ WS

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Apron XL WS may be applied as a water-based slurry with other registered seed treatment insecticides and fungicides through standard slurry- or mist-type commercial seed treatment equipment.

### Mixing Instructions

Prepare no more mixture than is needed 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.

**Note:** 1 lb. of Apron XL WS displaces 0.7 lbs. of water.

**Precautions:** (1) Water-soluble bags of Apron XL WS must be completely dissolved and dispersed in plain water before any other tank mix partner is added to the spray solution. (2) The maximum recommended concentration of Apron XL WS in slurries is 7 oz. of Apron XL WS in 10 oz. of water per 100 lbs. of seed.

**Apron XL WS Alone:** Add 1/4 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 Apron XL WS into 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 of the mixture has been applied.

**Apron XL WS + Tank Mixtures:** Add 1/4 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 Apron XL WS, 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 other products recommended for tank mixture and allow them to become completely dispersed. Continue agitation to maintain a uniform suspension until all of the spray solution has been applied.

If using Apron XL WS in a tank mixture with other seed treatment chemicals, 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.

### SEED TREATMENT – DOMESTIC USE

<b>Carrots</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Cereal Grains</b>	<p>Wheat, barley, rye, oats, millet, rice, corn (field corn, sweet corn, and popcorn), buckwheat, and triticale.</p> <p>For Pythium damping-off control: Apply Apron XL WS as a seed treatment at the rate of 0.27-0.53 oz./100 lbs. of seed.</p> <p>For Pythium seed rot and damping-off control in field corn when applied in combination with Maxim® or captan products at labeled rates: Apply Apron XL WS as a seed treatment at 0.035 oz./100 lbs. of seed.</p> <p>For systemic downy mildew control of sweet corn: Apply Apron XL WS as a seed treatment at the rate of 1.06 oz./100 lbs. of seed.</p> <p>For Pythium damping-off control in wheat, barley, rye, and oats, when applied in combination with Dividend® or other seed treatment products labeled for disease control in these crops: Apply Apron XL WS as a seed treatment at 0.035 oz./100 lbs. of seed.</p> <p>For Pythium seed rot and damping-off control in rice when applied in combination with Vitavax® 200, 42-S Thiram, or RTU® Vitavax-Thiram at labeled rates: Apply Apron XL WS as a seed treatment at 0.035-0.07 oz./100 lbs. of seed.</p> <p><b>Note:</b> If using Apron XL WS-treated rice seed, do not use Ridomil Gold® for control of Pythium in water seeded rice.</p>
<b>Cotton</b>	For Pythium seed rot and damping-off control: Apply Apron XL WS as a seed treatment to machine-delinted or acid-delinted cottonseed at the rate of 0.27-0.53 oz./100 lbs. of seed.
<b>Forage Grasses</b>	<p>Grasses grown for hay grazing or silage, corn (fodder or silage), and small grain grown for hay grazing or silage.</p> <p>For Pythium damping-off control: Apply Apron XL WS as a seed treatment at the rate of 0.27-0.53 oz./100 lbs. of seed.</p>
<b>Forage Legumes</b>	<p>Alfalfa, clover, lespedeza, beans (for forage), soybeans (for forage), soybean hay, peas (for forage), pea vine hay, cowpeas (for forage), cowpea hay, trefoil, vetch, and velvet beans (for forage).</p> <p>For Pythium damping-off and early season Phytophthora control: Apply Apron XL WS as a seed treatment at the rate of 0.53 oz./100 lbs. of seed.</p> <p>For suppression of early season downy mildew in alfalfa and soybeans: Apply Apron XL WS as a seed treatment at the rate of 0.53 oz./100 lbs. of seed.</p>

## SEED TREATMENT – DOMESTIC USE (continued)

<b>Garden/Table Beets</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at the rate of 0.53 oz./100 lbs. of seed.
<b>Legume Vegetables and Okra</b>	Black-eyed peas, cowpeas, edible soybeans, soybeans, field beans, chick peas (garbanzo beans), field peas, garden peas, green beans, kidney beans, lima beans, navy beans, okra, pinto beans, peas, pole beans, snap beans, string beans, wax beans, lentils, and lupines. For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed. For Pythium damping-off control in field beans, kidney beans, navy beans, pinto beans, and lentils when disease pressure is expected to be low: Apply Apron XL WS as a seed treatment at 0.07-0.27 oz./100 lbs. of seed in combination with other seed treatment products labeled for these crops. For early season Phytophthora control: Apply Apron XL WS as a seed treatment at 0.53 oz./100 lbs. of seed. For Pythium damping-off and systemic downy mildew control of peas: Apply Apron XL WS as a seed treatment at the rate of 1.06 oz./100 lbs. of seed.
<b>Peanuts</b>	For Pythium seed rot and damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Sorghum</b>	For Pythium damping-off control on all sorghum cultivars: Use 0.27-0.53 oz. of Apron XL WS per 100 lbs. of seed applied as a seed treatment. For Pythium damping-off control when pressure is expected to be low: Apply Apron XL WS as a seed treatment at 0.07-0.27 oz./100 lbs. of seed in combination with Maxim or captan products at labeled rates. For systemic downy mildew control: Apply 0.53 oz. of Apron XL WS per 100 lbs. of seed on cultivars which possess sorghum downy mildew resistance. To those cultivars which do not possess resistance to a particular race of sorghum downy mildew grown in areas with recent history of severe disease, apply 1.06 oz. of Apron XL WS per 100 lbs. of seed as a seed treatment. <b>Note:</b> Seed treated with the 1.06 oz. rate should be planted and not carried over to the following year. Only high quality sorghum seed (90% germ and above) should be treated with Apron XL WS.
<b>Soybeans</b>	For Pythium damping-off and early season Phytophthora control: Apply Apron XL WS as a seed treatment at the rate of 0.27-0.53 oz./100 lbs. of seed. For Pythium damping-off control when disease pressure is expected to be low: Apply Apron XL WS as a seed treatment at 0.07-0.27 oz./100 lbs. of seed in combination with other seed treatment products labeled for soybeans.
<b>Spinach</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed. <b>Note:</b> Do not apply Apron XL WS to spinach which is destined to be grown in the greenhouse. Containers or bags containing Apron-treated spinach seed must be labeled with the restriction: "Do not use seed for spinach destined to be grown in the greenhouse."
<b>Sugar Beets</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at the rate of 0.27-0.53 oz./100 lbs. of seed.
<b>Sunflower</b>	For systemic downy mildew control: Apply Apron XL WS as a seed treatment at the rate of 1.06 oz./100 lbs. of seed.
<b>Turfgrasses (All)</b>	For Pythium damping-off control on golf courses, home lawns, reclamation, and erosion control projects: Apply Apron XL WS as a seed treatment at the rate of 0.53-1.06 oz./100 lbs. of seed. <b>Note:</b> For long-term control of Pythium in areas when using Apron XL WS-treated seed, make an application of Subdue® MAXX™ 7-10 days after seeding.

**SEED TREATMENT – EXPORT USE**

FOR TREATMENT OF THE FOLLOWING SEED FOR EXPORT ONLY TO COUNTRIES REQUIRING TREATMENT WITH Apron XL WS BEFORE IMPORTATION. User should verify actual registered rate in country of destination and/or use.

<b>Brassica (Cole) Leafy Vegetables</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Corn</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed. For systemic downy mildew control: Apply Apron XL WS as a seed treatment at 1.77 oz./100 lbs. of seed.
<b>Cucurbits</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Fruiting Vegetables (e.g. tomatoes, peppers, eggplant)</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Leafy Vegetables</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Millet</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed. For systemic downy mildew control: Apply Apron XL WS as a seed treatment at 2.0 oz./100 lbs. of seed.
<b>Onions</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed.
<b>Peas</b>	For Pythium damping-off and early season Phytophthora control: Apply Apron XL WS as a seed treatment at the rate of 0.53-1.06 oz./100 lbs. of seed. For downy mildew control, apply Apron XL WS as a seed treatment at 1.06 oz./100 lbs. of seed.
<b>Root and Tuber Vegetables</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed. <b>Note: Do not apply Apron XL WS to potatoes.</b>
<b>Sorghum</b>	For Pythium damping-off control: Apply Apron XL WS as a seed treatment at 0.27-0.53 oz./100 lbs. of seed. For systemic downy mildew control: Apply Apron XL WS as a seed treatment at 1.77 oz./100 lbs. of seed.
<b>Sunflower</b>	For systemic downy mildew control: Apply Apron XL WS as a seed treatment at 3.1-3.72 oz./100 lbs. of seed.

Seed treated in accordance with the export use pattern must be labeled as follows: FOR EXPORT ONLY – NOT FOR DOMESTIC SALE OR USE.

**Note:** Federal law requires that bags containing treated seeds shall be labeled with the following information:

"This seed has been treated with Apron XL WS fungicide. Do not use for feed, food, or oil purposes. Store away from feeds and foodstuffs." Use with an EPA-approved dye that imparts an unnatural color to the seed.

**STORAGE AND DISPOSAL****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 bag.

**Pesticide Disposal**

Do not contaminate water, food, or feed by storage, 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 container. Dispose of empty outer container 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, 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.

**PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals****CAUTION**

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

**Statement of Practical Treatment**

**If in eyes:** Flush eyes with plenty of water. Get medical attention if irritation persists.

**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 irritation persists.

**Note to Physician:** If ingested, induce emesis or lavage stomach. Treat symptomatically.

**Personal Protective Equipment****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 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. Apply only as specified on this label. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment wash water or rinsate.

**Physical or Chemical Hazards**

Do not use or store near heat or open flame.

Accu-Pak®, Dividend®, Maxim®, Ridomil Gold®, and Subdue® MAXX™ trademarks of Syngenta

RTU® trademark of Gustafson, Inc.

Vitavax® trademark of Uniroyal Chemical Company, Inc.

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Syngenta Crop Protection, Inc.  
Seed Treatment Products  
Greensboro, North Carolina 27409  
www.syngenta-us.com

SCP 797A-L1B 0401



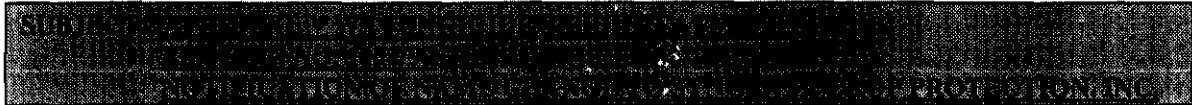
Certified Mail

July 13, 2001

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (H7504C)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Attn: Ms. Sherada Hobgood (RD)

Dear Ms. Hobgood:



Enclosed is one copy of the subject product label which includes the following changes: [Note: Although a change in company name and address according to PR Notice 98-10 Part IV D. does not require a notification to the Agency as long as the ownership of the registration has been officially changed, Syngenta is submitting this notification to aid in state registration. In addition, the use of the former Zeneca warranty statement (see below) on former Novartis products, we believe, constitutes the need for a notification.]

1. Company name and address have been updated to reflect Syngenta Crop Protection, Inc.
2. The Conditions of Sale and Warranty statement has been changed to reflect the name change. Because Syngenta has been formed by the merger of Novartis Crop Protection, Inc. and Zeneca Ag Products, we have chosen to use the former Zeneca warranty statement as the Syngenta warranty statement. No other changes occur in the statement other than the name change.
3. The copyright date reflects Syngenta.
4. Trademark statements have been updated to reflect Syngenta for those products for which Syngenta holds the trademark.
5. The Internet address has been changed to reflect Syngenta.
6. Other places in the label which referring to the company name have been updated

All of the above changes have been highlighted in the copy of labeling provided.