



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

FEB 22 2007

Patrick McCain  
Syngenta Crop Protection, Inc.  
P.O. Box 18300  
Greensboro, NC 27419-8300

Subject: Dividend™ XL RTA® Fungicide  
EPA Registration Number 100-826  
Your label amendment application dated July 11, 2006  
for decision D369338 that adds Barley seed treatment to  
the label and makes other labeling changes, and a  
related submission dated April 16, 1997.

We have reviewed the subject amended labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. The amended labeling is acceptable provided that:

1. You submit to the Agency each of the following studies or materials by its stated due date.
  - a. Submit, by December 31, 2007, storage stability data for the processed commodities of apples (wet pomace and juice) and grapes (raisin and juice) that reflect the longest storage intervals reported in the respective processing studies. This is 17.5 months for apples, 14.2 months for grape juice, and 4.2 months for raisins.
  - b. Submit, by July 31, 2008, a Soil Photolysis study (Guideline Requirement No. 161-3; OPPTS 835.241). Both the natural and the artificial sunlight studies that were submitted were not scientifically valid and did not provide useful information on the photodegradation

of Difenoconazole in sandy loam soil. Since soil degradation, aquatic degradation, and degradation by hydrolysis is slow, but degradation by aqueous photolysis is relatively fast, soil photolysis may be an important route of degradation. Understanding this route would provide a better characterization of the fate of Difenoconazole in the environment, especially of its availability for runoff into water bodies.

c. Submit, by July 31, 2008, a study that determines the toxicity of Difenoconazole residues to benthic organisms. The environmental fate and effects risk assessment does not estimate risk for sediment dwelling organisms because such a toxicity study was not provided. Because Difenoconazole is persistent and has a high Koc, its residue concentrations in sediment are expected to be higher than those in the water column. You are encouraged to contact the Agency concerning the specific type and protocol of study that would be most useful in this regard.

2. You make and submit, by July 31, 2007, the changes to the confirmatory residue analytical method that have been recommended by EPA's Analytical Chemistry Laboratory (ACL), and this revised method is then determined by the Agency to be suitable for tolerance enforcement.

3. Submit one copy of your final printed master and supplemental labels before you release product bearing this amended labeling for shipment.

The Agency also requests that the French and Swiss versions of the product label for Score® 250 EC/Slick® 250 EC be amended to specify a post-harvest interval (PHI) for grapes. Available data will support a 55-day PHI.

In the Agency's risk assessment for 1,2,4-triazole and its metabolites triazole alanine, and triazole acetic acid, dated February 7, 2006 (see docket number 2005-0497 at <http://www.regulations.gov>), the Agency identified additional data that are needed for triazole-derivative active ingredients which have the 1,2,4,-triazole ring. The Agency plans to issue a Data Call-In for all triazole-derivative active ingredients which will identify all data needs for these active ingredients listed in the February 7, 2006 risk assessment. The Data Call-In will not address data needs that are related to parent-only data requirements.

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If you have any questions about this letter, please contact  
John Bazuin at (703)305-7381 or bazuin.john@epa.gov.

Sincerely yours,

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Cynthia Giles-Parker  
Chief  
Fungicide Branch  
Registration Division (7505C)

Attachments: Master label stamped "ACCEPTED with COMMENTS"

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Booklet Label

**Dividend™ XL RTA®**

**Fungicide**

A seed treatment for control of diseases of wheat and barley

Active Ingredients:

Difenoconazole* .....	3.21%
Mefenoxam** .....	0.27%
<hr/>	
Other Ingredients:	96.52%
<hr/>	
Total:	100.00%

\*CAS No. 119446-68-3

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

Dividend XL RTA contains 0.31 lbs. difenoconazole and 0.025 lb. mefenoxam per gallon.

**KEEP OUT OF REACH OF CHILDREN.**

**CAUTION**

**See additional precautionary statements and directions for use inside booklet.**

EPA Reg. No. 100-826

(For 2½ Gallons)

EPA Est. 5905-GA-1

SCP 826A-L1 (2½ gals.)

SCP 826A-L2 (\_\_\_\_ gals.)

2.5 gallons

Net Contents

\_\_\_\_ gallons

Net Contents

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated**

FEB 22 2007

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

100-  
826

<b>FIRST AID</b>	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
If ingested, induce emesis and treat symptomatically.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>HOT LINE NUMBER</b>	
For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call <b>1-800-888-8372</b>	

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## **PRECAUTIONARY STATEMENTS**

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### **Hazards to Humans and Domestic Animals**

#### **CAUTION**

Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear long-sleeved shirt and long pants, socks and shoes, and chemical-resistant gloves made of any waterproof material. Wash thoroughly with soap and water after handling.

### **Personal Protective Equipment (PPE)**

#### **Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material

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**

This product is toxic to fish and aquatic invertebrates. 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 or rinsate.

If treated seed is spilled outdoors or in areas accessible to birds, promptly clean up or bury to prevent ingestion.

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**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

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**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. To the fullest extent allowed by State 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. 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 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.

To the fullest extent allowed by State law, SYNGENTA or Seller shall not 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 Limitation of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

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### 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.

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, wear:

- Coveralls
- Socks plus shoes
- Chemical-resistant gloves made of any waterproof material

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



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## **STORAGE AND DISPOSAL**

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Do not contaminate water, food, or feed by storage or disposal.

### **Pesticide Storage**

Keep container tightly closed when not in use. Store out of the reach of children.

### **Spill Response**

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 and disposal of wastes. In the event of a major spill, fire, or other emergency, call 1-800-888-8372, day or night.

### **Pesticide Disposal**

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

### **Container Disposal**

#### **2½ Gallon Containers**

Do not reuse empty container. Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or by open burning, if allowed by state and local authorities. If burned, keep out of smoke.

### **Syngenta Refillable Container**

If this is a Syngenta refillable container, and is to be refilled, do not rinse or introduce any pesticide other than Dividend XL RTA. Reseal and return the container to an authorized Syngenta refilling facility. If the Syngenta container is not to be refilled, triple rinse (or equivalent), and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or by open burning if allowed by state and local authorities. If burned, keep out of smoke.

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## **GENERAL INFORMATION**

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Dividend XL RTA is a systemic seed dressing that controls or suppresses certain seed-borne, soil-borne, and early season foliar diseases of wheat and barley. It is a mixture of Dividend and Apron XL® LS. Apron XL LS provides Pythium damping-off activity and Dividend provides activity on the remaining diseases claimed on this label. An EPA-approved coloring agent, Pigment Red 48 has been added to the formulation.

**Note:** Mefenoxam is a systemic fungicide having a specific mode of action. Apron XL LS 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 mefenoxam insensitive strains of fungi which may occur.

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## **MIXING PROCEDURES**

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Dividend XL RTA is especially formulated for on-farm treatment, using standard mechanical slurry- or mist-type seed treatment equipment which accurately meters and mixes a flowable seed treatment. The equipment must provide uniform coverage of Dividend XL RTA on the seed. Uneven seed coverage may not give the desired level of disease control. This product does not require the addition of water for application. Consult the manufacturer of the application equipment you plan to use for suitability for this application and for instructions on operation and calibration of the equipment.

### **Tank Mixtures**

Confirm physical compatibility, seed safety, seed safety in stored seed, and biological efficacy before tank mixing with other seed treatment products.

Follow the label directions for the most restrictive of label precautions and limitations. This product cannot be mixed with any product containing a label prohibition against such mixing.

## **RESTRICTIONS**

- Do not use for feed, food, or oil purposes. Store away from feeds and foodstuffs.
- Green wheat forage may not be grazed until 55 days after planting.
- Green barley forage may not be grazed until 30 days after planting.
- Do not plant any crop other than those on this label within 30 days to fields in which treated seeds were planted.

## **SEED BAG LABEL REQUIREMENT**

Federal law requires that bags containing treated seeds shall be labeled with the following information: "This seed has been treated with the fungicides difenoconazole (CAS No. 119446-68-3) and mefenoxam (CAS Nos. 70630-17-0 and 69516-34-3). Do

not use for feed, food, or oil purposes. Store away from feeds and foodstuffs. Green wheat forage may not be grazed until 55 days after planting. Green barley forage may not be grazed until 30 days after planting. Do not plant any crop other than those on this label within 30 days to fields in which treated seeds were planted.”

**BARLEY**

Apply Dividend XL RTA to barley seed at the rates given in the following table:

<b>Rate/CWT</b>	<b>Diseases Controlled</b>	<b>Diseases partially controlled<sup>1</sup></b>
5 fl. oz.	Barley Stripe General Seed Rots <sup>2</sup> Covered Smut Pythium Damping Off	Common Root Rot ( <i>Cochiliobolus</i> spp.) Fusarium Seed Scab Rhizoctonia Root Rot
10 fl. oz.	Barley Stripe General Seed Rots <sup>2</sup> Fusarium Seed Scab Covered Smut Pythium Damping Off	Take-all Common Root Rot ( <i>Cochilobolus</i> spp.) Fusarium Root Rot Fusarium Crown Rot Rhizoctonia Root Rot

<sup>1</sup> Partial control can either mean erratic control from good to poor, or consistent control at a level below that is generally considered acceptable for commercial disease control.

<sup>2</sup> General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

**WHEAT**

Apply Dividend XL RTA to wheat seed at the rates given in the following table:

**Winter Wheat**

Rate/CWT	Diseases Controlled	Fall Season Foliar Diseases Controlled <sup>1</sup>	Diseases Partially Controlled <sup>2</sup>
2.5 fl. oz. <sup>5</sup>	Common Bunt Loose Smut		
5 fl. oz.	Common Bunt <sup>3</sup> Dwarf Bunt Flag Smut Seed-borne Septoria Loose Smut General Seed Rots <sup>4</sup> Fusarium Seed Scab Pythium Damping-Off		Common Root Rot ( <i>Cochliobolus</i> spp.) Rhizoctonia Root Rot
10 fl. oz.	Common Bunt <sup>3</sup> Dwarf Bunt Loose Smut Flag Smut Seed-borne Septoria General Seed Rots <sup>4</sup> Fusarium Seed Scab Pythium Damping-Off	Fall Season Powdery Mildew Fall Season Leaf Rust Fall Season Septoria Leaf Blotch	Common Root Rot ( <i>Cochliobolus</i> spp.) Fusarium Root Rot Fusarium Crown Rot Take-All Rhizoctonia Root Rot

<sup>1</sup>Dividend XL RTA provides control of fall season powdery mildew, fall season leaf rust, and fall season Septoria leaf blotch in winter wheat for the first 6 weeks after planting. For full season control of these foliar diseases, use Tilt® fungicide according to label instructions.

<sup>2</sup>Partial control can either mean erratic control from good to poor or consistent control at a level below that generally considered acceptable for commercial disease control.

<sup>3</sup>Dividend XL RTA controls both seed-borne and soil-borne common bunt.

<sup>4</sup>General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

<sup>5</sup>The 2.5 fl. oz. rate should only be used in the following states: TX, OK, KS, CO, MO, NE, ND, SD, MN, MT, CA.

**Spring Wheat**

<b>Rate/CWT</b>	<b>Diseases Controlled</b>	<b>Diseases Partially Controlled<sup>4</sup></b>
2.5 fl. oz. <sup>3</sup>	Common Bunt Loose Smut Fusarium Seed Scab	
5 fl. oz.	Common Bunt <sup>1</sup> Seed-borne Septoria Loose Smut General Seed Rots <sup>2</sup> Fusarium Seed Scab Pythium Damping-Off	Common Root Rot ( <i>Cochliobolus</i> spp.) Rhizoctonia Root Rot
10 fl. oz.	Common Bunt <sup>1</sup> Loose Smut Flag Smut Seed-borne Septoria General Seed Rots <sup>2</sup> Fusarium Seed Scab Pythium Damping-Off	Take-All Common Root Rot ( <i>Cochliobolus</i> spp.) Rhizoctonia Root Rot

<sup>1</sup>Dividend XL RTA controls both seed-borne and soil-borne common bunt.

<sup>2</sup>General seed rots controlled include those caused by saprophytic organisms, such as *Penicillium* spp. and *Aspergillus* spp.

<sup>3</sup>The 2.5 fl. oz. rate should only be used in the following states: TX, OK, KS, CO, MO, NE, ND, SD, MN, MT, CA.

<sup>4</sup>Partial control can either mean erratic control from good to poor or consistent control at a level below that generally considered acceptable for commercial disease control.

Apron XL®, Dividend®, Dividend® XL RTA®, Tilt® and the Syngenta logo are trademarks of a Syngenta Group Company

U.S. Patent No. 5,266,585

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For non-emergency (e.g. current product information) call  
Syngenta Crop Protection at 1-800-334-9481.

Syngenta Crop Protection, Inc.  
Greensboro, North Carolina 27409  
[www.syngenta-us.com](http://www.syngenta-us.com)

SCP 826A-L1 (2½ gals.)  
SCP 826A-L2 (\_\_\_\_ gals.)

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Base Label  
(For 2½ gallons)

**Dividend™ XL RTA®**

**Fungicide**

A seed treatment for control of diseases of wheat and barley

Active Ingredients:

Difenoconazole* .....	3.21%
Mefenoxam** .....	0.27%
<hr/>	
Other Ingredients:	96.52%
Total:	100.00%

\*CAS No. 119446-68-3

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

Dividend XL RTA contains 0.31 lb. difenoconazole and 0.025 lb. mefenoxam per gallon.

**KEEP OUT OF REACH OF CHILDREN.**

**CAUTION**

See directions for use in attached booklet.

**AGRICULTURAL USE REQUIREMENTS**

**Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.**

EPA Reg. No. 100-826

EPA Est. 5905-GA-1

2.5 gallons  
Net Contents

<b>FIRST AID</b>	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
If ingested, induce emesis and treat symptomatically.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>HOT LINE NUMBER</b>	
For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call <b>1-800-888-8372</b>	

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## **PRECAUTIONARY STATEMENTS**

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Hazards to Humans and Domestic Animals

Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear long-sleeved shirt and long pants, socks and shoes, and chemical-resistant gloves made of any waterproof material. Wash thoroughly with soap and water after handling.

### **Environmental Hazards**

This product is toxic to fish and aquatic invertebrates. 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 or rinsate.

If treated seed is spilled outdoors or in areas accessible to birds, promptly clean up or bury to prevent ingestion.

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## **STORAGE AND DISPOSAL**

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Do not contaminate water, food, or feed by storage or disposal.

### **Container Disposal**

Do not reuse empty container. Triple rinse (or equivalent), and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or by open burning, if allowed by state and local authorities. If burned, keep out of smoke.

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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 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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Syngenta Crop Protection, Inc.  
Greensboro, North Carolina 27409  
[www.syngenta-us.com](http://www.syngenta-us.com)

SCP 826A-L1 (2½ gals.)

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