

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUN - 8 2007

Mr. Fred J. Pearson Syngenta Crop Protection, Inc. P. O. Box 18300 Greensboro, NC 27419-8300

Subject:

New Sites for Thiamethoxam

Platinum Insecticide EPA Reg. No. 100-939

Your Submission date, March 27, 2007

Dear Mr. Pearson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable provided the following conditions are addressed within one year from the date of the stamped label.

860.1650 Submittal of Analytical Reference Standards

• The analytical reference standard for thiamethoxam metabolite CGA-322704 currently available at the EPA National Pesticide Standards Repository has expired. The Syngenta must either recertify the lot in the repository and send in an updated certificate of analysis, or submit a new standard (different lot #) if the previous lot will not be recertified.

860.1550 Proposed Tolerances

• The proposed tolerances should be revised to reflect the recommended tolerance levels and correct commodity definitions as specified in Table 10. In addition, the tolerance for grape juice should be removed from the petition; the available data indicate that a tolerance is not needed for grape juice. Please submit a revised Section F.

860.1340 Residue Analytical Methods

• The Syngenta must submit a revised version of Method AG-675 which includes the full extraction steps for plant and livestock commodities, including the microwave extraction step for liver. The revised method will then be forwarded to FDA for inclusion in PAM Vol. II.

860.1480 Meat, Milk, Poultry, Eggs

The Syngenta must conduct a new poultry feeding study in which liver samples are
analyzed using the modified enforcement method, which includes a microwave extraction
step. Liver samples should be analyzed for residues of CGA-322704 and CGA-265307
as these metabolites were found in significant quantities in the microwave hydrolysate in
the metabolism study.

860.1500 Crop Field Trials

- A residue decline study is required to fulfill data requirements for barley.
- If Syngenta wishes to support soil applications to tuberous and corm vegetables later than crop emergence, additional crop field trial data are required.
- Syngenta must provide an explanation for the residues observed in/on untreated leafy vegetable samples in the crop field trial study reported in MRID 45880901.

860.1520 Processed Food and Feed

• Syngenta had previously been required to submit complete sample history information including storage conditions for processed apple commodities to support the apple processing study reported in MRID 44715134 (conclusion 26 of PP#9F5051 review, DP Barcode D265079, 5/8/00, G.J. Herndon). This information remains outstanding.

860.1900 Field Accumulation in Rotational Crops

• Syngenta had previously been required to submit information pertaining to sample storage conditions for rotational crop commodities to support the field rotational crop study reported in MRID 44715106 (conclusion 34 of PP#9F5051 review, DP Barcode D265079, 5/8/00, G.J. Herndon). This information remains outstanding.

If these conditions are complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of this conditions. A stamped copy is enclosed for your records. Submit two (2) copies of your final printed labeling before you release the product for shipment. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel

Insecticide-Rodenticide Branch Registration Division 7505P

Enclosure:

(Booklet)

Platinum[®]

Insecticide

GROUP 4A INSECTICIDE

For control of certain insect pests infesting various crops

Active Ingredient:

Thiamethoxam ¹	21.6%
Other Ingredients:	78.4%
Total:	100.0%

¹CAS No. 153719-23-4

Platinum is a soluble concentrate containing 2 pounds of active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use in booklet.

EPA Reg. No. 100-939

Formulated in the USA

EPA Est. XXXXX

SCP 939A-L1(draft) (72 fl. oz.) SCP 939A-L2(draft) (16 fl. oz.) SCP 939A-L3 (draft) [2.5 gals. (320 fl. oz.)]

16 fl. oz. 72 fl. oz. 2.5 gallons (320 fl. oz.) Net Contents ACCEPTED with COMMENTS
In EPA Letter Dated:
JUN - 8 2007

Under the Federal Insecticities, Pungicide, and Rodenticide Act, as amended, for the posterior registered under EPA Reg. No.

FIRST AID		
If inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice. 	
If in eyes	 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	 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	 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. 	
stomach. Treat s	NOTE TO PHYSICIAN ific antidote if Platinum is ingested. Induce emesis or lavage symptomatically.	
Have the produc or doctor, or goir	t container or label with you when calling a poison control center og for treatment.	
	HOT LINE NUMBER Our Medical Emergency Assistance (Human or Animal) or al Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor or spray mist. Wash

thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material Category A (e.g., barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride [PVC] or viton)
- · Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statements

When handlers use closed systems, enclosed cabs, or aircraft 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 pesticide is toxic to wildlife and highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when cleaning equipment or disposing of equipment wash water.

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Surface Water Advisory

This product may contaminate water through drift of spray in wind. This product has a high potential for runoff for several months or more after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential for contamination of water from rainfall runoff (see manual at the following Internet address: http://www.wcc.nrcs.usda.gov/pestmgt/core4.html).

Runoff of this product will be reduced by avoiding applications when rainfall is forecast to occur within 48 hours.

Ground Water Advisory

Thiamethoxam has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

Spray Drift Advisory

Do not allow this product to drift.

Physical and 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. 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. To the extent consistent with applicable law, 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 extent consistent with applicable law, 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 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. Read entire label before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls
- Chemical—resistant gloves made of any waterproof material —
 Category A (e.g., barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride [PVC] or viton)
- Shoes plus socks

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

GENERAL INFORMATION

Platinum controls many sucking and chewing insects through ingestion when applied to the crops listed on this label.

For best performance, always follow these directions:

- Platinum should be applied in a manner which allows the insecticide to be absorbed by plant roots. This may be accomplished with a variety of application methods, as indicated in this label. Although Platinum is rapidly taken up by plant roots and rapidly moves throughout the plant, the use of sufficient water volume will ensure that the chemical contacts the roots, resulting in optimal uptake and performance.
- Platinum is a selective insecticide, which should have minimal impact on beneficial arthropods, and its use is compatible with integrated pest management programs.
- Platinum has a wide margin of plant safety when used in accordance with this label.
- Do not use Platinum in nurseries, plant propagation houses, greenhouses, or on any plants grown for use as transplants except tobacco.
- **NOTE**: Do not use a foliar application of thiamethoxam (Actara®) following an infurrow or soil application of thiamethoxam (Platinum).
- If the maximum season limit of thiamethoxam defined in the Crop Use Directions section of this label has been applied, and pest populations require additional treatments, use another registered pesticide that is not in the neonicotinoid class of chemistry.

Resistance Management

Some insect pests are known to develop resistance to products after repeated use. Because resistance development cannot be predicted, the use of this product should conform to sound resistance management strategies established for the crop and use area. Syngenta encourages responsible product stewardship to ensure effective long-term control of the insects on this label.

Platinum contains a Group 4A insecticide (thiamethoxam, belonging to the neonicotinoid class of chemistry). Insect biotypes with acquired or inherent resistance to Group 4A insecticides may eventually dominate the insect population if Group 4A insecticides are used repeatedly as the predominant method of control for targeted species. This may result in partial or total loss of control of those species by Platinum or other Group 4A insecticides.



In order to maintain susceptibility to this class of chemistry in insect species with high resistance development potential, it is recommended that for each crop season:

- 1. Only a single, soil application of Platinum be made.
- 2. Foliar applications of Group 4A insecticides not be made following a long residual, soil application of Platinum, or other seed or soil applied Group 4A insecticides.

Other Insect Resistance Management (IRM) practices include:

- Incorporating IPM techniques into your insect control program.
- Monitoring treated insect populations for loss of field efficacy.
- Using tank-mixtures or premixes with insecticides from a different target site of action Group as long as the involved products are all registered for the same crop outlet and effective rates are applied.

For additional information on Insect Resistance Management:

- Contact your local extension specialist, certified crop advisor and/or product manufacturer for additional insect resistance management recommendations.
- Visit the Insecticide Resistance Action Committee (IRAC) on the web at http://www.irac-online.org/.

APPLICATION PROCEDURES AND SPRAY EQUIPMENT

Soil Application

Spray nozzles or metering orifices should provide accurate and uniform spray deposition. Platinum may be applied in-furrow at-planting, as a lay-by shanked application, or as a banded preemergence or postemergence application. When making postemergence applications, direct the application at the base of the plant for optimum root uptake. To help insure accuracy, calibrate sprayer before each use. Applications using sufficient water volume to provide thorough and uniform coverage generally provide the most effective pest control. For information on spray equipment and calibration, consult sprayer manufacturers and/or State Extension Service specialists.

Do not apply Platinum as a broadcast foliar spray with ground or aerial equipment.

Dry Bulk Granular Fertilizer – Potatoes only: Many dry bulk fertilizers may be impregnated or coated with Platinum and used to control insects in potatoes. When applying Platinum with dry bulk granular fertilizer, follow all directions for use and precautions on the Platinum label contained in the potato direction for use section regarding rates per acre, pests controlled, and rotational crop restrictions.

All individual state regulations relating to dry bulk granular fertilizer blending, registration, labeling, and application, are the responsibility of the individual and/or company selling the insecticide/fertilizer mixture.

Prepare the insecticide/fertilizer mixture by using any closed drum, belt, ribbon, or other commonly used dry bulk fertilizer blender. Nozzles used to spray Platinum onto the fertilizer must be placed to provide uniform spray coverage. Care should be taken to aim the spray onto the fertilizer only, avoiding the walls of the blender. Do not pour or dribble Platinum directly from the product container onto the fertilizer.

Blender Mixing Directions

Fill the blender with the required amount of dry bulk granular fertilizer to be used. Start the blender. Spray the Platinum directly onto the moving fertilizer. Allow the mixture to blend for at least 5 minutes or until uniform. Spread the insecticide/fertilizer mixture as soon as possible.

Calculate the amount of Platinum by the following formula:

<u>oz./acre Platinum</u> X 2,000 lb./ton = oz./ton Platinum lb./acre Fertilizer

Important: When more than 1,000 lb./A of dry bulk granular fertilizer is to be applied, mix Platinum with water to improve coverage on the dry fertilizer. Mix one part Platinum with up to 2 parts water [1:2] in a mix tank before application to fertilizer. Use a maximum of 2 qt. liquid per ton of fertilizer.

Precautions: Do not impregnate Platinum on straight unadulterated agricultural limestone, since adsorption will not be achieved. Limestone prills, which contain a binding agent and fertilizer blends containing limestone can be impregnated.

Application: For best results, apply the mixture uniformly to the soil with properly calibrated equipment **immediately** after blending. Non-uniform application of the insecticide/fertilizer mixture may result in unsatisfactory insect control.

Chemigation: Applications of Platinum alone or in combination 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 only through low-pressure micro-sprinkler or drip type irrigation systems. Do not apply Platinum through any other type of irrigation system.

General Directions for All Recommended Types of Irrigation Systems

Uniform Water Distribution and System Calibration

The irrigation system must provide uniform distribution of treated water. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water. The system must be calibrated to uniformly apply the rates specified. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers, or other experts. A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Dilute Platinum in the solution tank at a ratio of at least 15 parts of water to one part of Platinum. Inject Platinum solution at a ratio of 50:1 or greater. Injecting a larger volume of a more dilute solution will usually allow a more accurate calibration of the metering equipment. Meter the insecticide into the irrigation water during the irrigation cycle.

Using Water from Public Water Systems: DO NOT APPLY PLATINUM THROUGH ANY IRRIGATION SYSTEM PHYSICALLY CONNECTED TO A PUBLIC WATER SYSTEM. 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. Platinum may be applied through irrigation systems, which may be supplied by a public water system only if the water from the public water system is 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 to top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe. Before beginning chemigation, always make sure that the air gap exists and that there is no blockage of the overflow of the reservoir tank.

Any irrigation system using water supplied from a public water system must also meet the following requirements.

Operating Instructions FOR ALL RECOMMENDED TYPES OF IRRIGATION SYSTEMS

- 1. The system must be calibrated to uniformly apply the rates specified. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers, or other experts.
- 2. 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.

- 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 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.
- 5. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- 6. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- 7. 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.

Application Instructions

Platinum 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 low-pressure micro-sprinkler or drip type irrigation equipment. Users should check with state and local regulatory agencies for potential use restrictions before applying any agricultural chemicals through 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 injection point.
- 5. For calibration, substitute a concentrated detergent (such as Wisk) for the Platinum mixture in the injector (solution) tank. It is important to use the same volume of soap solution as the planned volume of Platinum solution when calibrating the system. The detergent will bubble as it leaves the emitters. The time period over which the 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 Calibration and Application Instructions

- 1. Before starting to calibrate, operate the system until all of 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 rate of indicator as the planned volume of Platinum to be used in the mix.
- 3. Set the injector to apply the indicator solution at the injection rate to be used in the actual Platinum application.
- 4. Attach a 12-inch length of flexible tubing over the emitter closest to the injection point, another 12-inch 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 flexible tubes into a small container. Begin timing when the indicator solution is first detected. Stop timing when the indicator solutions are no longer detected in the container.
- 6. If the period of detection of the indicator solution between the near and far emitter is within 2 minutes, comparable coverage will be obtained. If they are not, make adjustments by increasing the dilution ratio, using more water per part of Platinum, or adjust the injector to a slower flow rate.
- 7. Once the system is calibrated, dilute the needed amount of Platinum with water and any other tank mix partners in the injection tank at a minimum dilution of 15 parts water to 1 part Platinum. Follow the directions for mixing and equipment set up in the **Mixing Procedures** section of this label for complete details.
- 8. Do not begin to inject Platinum into the system until all emitters are producing equal flow rates, or until the system is at full pressure.
- 9. Inject the Platinum solution into the system at the beginning of the irrigation set in ½-1 inch of irrigation water.

MIXING PROCEDURES

Prepare no more spray mixture than is needed for the immediate operation. Thoroughly clean spray equipment before using this product. Vigorous agitation is necessary for proper dispersal of 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. Keep product container tightly closed when not in use.

Platinum Alone: Add 1/2 of the required amount of water to the mix tank. With the agitator running, add the Platinum to the tank. Continue agitation while adding the remainder of the water. Begin application of the solution after the Platinum has completely dispersed into the mix water. Maintain agitation until all of the mixture has been applied.

Platinum + Tank Mixtures: Add 1/2 of the required amount of water to the mix tank. Start the agitator running before adding any tank mix partners. In general, tank mix partners should be added in this order: products packaged in water-soluble packaging, wettable powders, wettable granules (dry flowables), liquid flowables such as Platinum, liquids and emulsifiable concentrates. Always allow each tank mix partner to become fully dispersed before adding the next product. Provide sufficient agitation while adding the remainder of the water. Maintain agitation until all of the mixture has been applied.

Note: When using Platinum in tank mixtures, all products in water-soluble packaging should be added to the tank before any other tank mix partner, including Platinum. Allow the water-soluble packaging to completely dissolve and the product(s) to completely disperse before adding any other tank mix partner to the tank.

If using Platinum in a tank mixture, observe all directions for use, crop/sites, use rates, dilution ratios, precautions, and limitations that 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 that prohibits such mixing. Tank mixtures or other applications of products referenced on this label are permitted only in those states in which the referenced products are labeled.

Compatibility: Platinum is compatible with most commonly used pesticides and nutritional sprays. However, since it is not possible to test all possible mixtures, the user should pre-test to insure the physical compatibility and lack of phytotoxic effect of any proposed mixtures with Platinum. To determine the physical compatibility of Platinum with other products, use a jar test, as described below.

Using a quart jar, add the proportionate amounts of the products to 1 qt. of water. Add wettable powders and water-dispersible granular products first, then liquid flowables, and emulsifiable concentrates last. After thoroughly mixing, let stand for at least 5

minutes. If the combination remains mixed or can be remixed readily, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank.

The crop safety of all potential tank mixes on all crops has not been tested. Before applying any tank mixture not specifically recommended on this label, the safety to the target crop should be confirmed.

CROP USE DIRECTIONS

Recommended Applications

Сгор	Pest	Rate Per Acre Per Application
Bushberry Subgroup Blueberry (high and low bush) Currant Elderberry Gooseberry Huckleberry	Aphids Grub Complex Japaneese Beetle Leafhoppers	5.0 – 12.0 fl. oz./A
Juneberry Lingonberry Salal		

Remarks:

- ApplicationTiming: Apply after bud-break, but prior to the beginning of bloom (first open blooms).
- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1000 linear ft.
- Application Method: Apply a surface band on each side of the row out to the plant canopy drip line
 or within the vegetation-free herbicide strip (calculated on a broadcast basis, but concentrated in the
 band). After the application, apply sufficient irrigation to incorporate the product into the plant's root
 zone, on the same day as the application.
- Water Volume: Apply specified dosage in sufficient water volume (10-100 gallons of water /A) to
 ensure uniform application and incorporation into the soil.
- Pre-Harvest Interval (PHI): 75 days
- Maximun Platinum Allowed per Growing Season: 12 fl. oz./Acre (0.188 lb. a.i./A)

Crop Brassica (Cole) Leafy Vegeta	Pest	Rate Per Acre Per Application
Head & Stem Brassica Broccoli Brussels sprouts Cabbage Cauliflower Cavalo broccolo Chinese broccoli Chinese cabbage (napa) Chinese mustard cabbage Kohlrabi	Aphids Flea Beetles Thrips Whiteflies	5.0 – 11.0 fl. oz./A
Leafy Brassica Greens Broccoli raab Chinese cabbage (bok choy) Collards Kale Mizuna Mustard greens Mustard spinach Rape greens		

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Remarks:

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1000 linear ft.
- Application Methods: Apply specified dosage in sufficient water volume to ensure uniform application and incorporation into the soil using one of the following methods:
 - 1. In-furrow spray at the seeding or transplant depth, or a narrow surface band above the seedline during planting. For surface-banded applications, incorporate to the seeding depth with sufficient sprinkle or drip irrigation within 24 hours.
 - 2. Post seeding, transplant, or hill drench using sufficient water volume to ensure incorporation into the root zone.
 - 3. In trickle or drip irrigation water.
 - 4. Shanked into the root zone after establishment or transplanting using fertilizer knives or other similar equipment. After application, incorporate with enough irrigation to move the chemical to the root zone.
- For planting systems where multiple rows are planted on beds, apply Platinum according to one of the above methods.
- Pre-Harvest Interval (PHI): 30 days
- Maximum Platinum Allowed per Growing Season: 11 fl. oz./Acre (0.172 lb. a.i./A)

Сгор	Pest	Rate Per Acre Per Application
Cucurbit Vegetables Chayote Chinese waxgourd Citron melon Cucumber Edible gourd Gherkin Momordica species Muskmelon Pumpkin Squash: summer and winter Watermelon	Aphids Cucumber Beetle Flea Beetles Leafhoppers Leafminers ¹ Thrips Whiteflies	5 – 11.0 fl. oz./A

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1,000 linear ft.
- Appliction Method: Apply specified dosage in sufficient water volume to ensure uniform application and incorporation into the soil using one of the following methods:
 - 1. In-furrow spray at the seeding or transplant depth, or a narrow surface band above the seedline during planting. For surface-banded applications, incorporate to the seeding depth with sufficient sprinkle or drip irrigation within 24 hours.
 - 2. Post seeding, transplant, or hill drench using sufficient water volume to ensure incorporation into the root zone.
 - 3. In trickle or drip irrigation water.
 - 4. Shanked into the root zone after establishment or transplanting using fertilizer knives or other similar equipment. After application, incorporate with enough irrigation to move the chemical to the root zone.
- Pre-Harvest Interval: 30 days
- Maximum Platinum Allowed per Growing Season: 11 fl. oz./Acre (0.172 lb. a.i./A)
- Pest Control: ¹Suppression

Сгор	Pest	Rate Per Acre Per Application
Fruiting Vegetables Eggplant Groundcherry Pepino Péppers: bell, chili, cooking, pimento, and sweet Tomatillo Tomato	Aphids Colorado Potato Beetles Flea Beetles Leafhoppers Leafminers Potato Psyllid Thrips Tomato Pinworm Whiteflies	5 – 11.0 fl. oz./A

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1,000 linear ft.
- Application Method: Apply specified dosage in sufficient water volume to ensure uniform
 application and incorporation into the soil using one of the following methods:
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 - 3. In trickle or drip irrigation water.
 - 4. Shanked into the root zone after establishment or transplanting using fertilizer knives or other similar equipment. After application, incorporate with enough irrigation to move the chemical to the root zone.
- For planting systems where multiple rows are planted on beds, apply Platinum according to one of the above methods.
- Pre-Harvest Interval (PHI): 30 days
- Maximum Platinum Allowed per Growing Season: 11 fl. oz./Acre (0.172 lb.a.i./A)
- Pest Control: ¹Suppression

Crop	Pest	Rate Per Acre Per Application
Grapes	Phylloxera spp. Japanese Beetle Leafhoppers Mealybugs Sharpshooters	8.0 – 17.0 fl. oz./A <u>.</u>

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1000 linear ft.
- Application Method: Apply a surface band on each side of the row out to the plant canopy drip line
 or within the vegetation-free herbicide strip (calculated on a broadcast basis, but concentrated in the
 band). After the application, apply sufficient irrigation to incorporate the product into the plant's root
 zone, on the same day as the application.
- Water Volume: Apply specified dosage in sufficient water volume (10-100 gallons of water /A) to ensure uniform application and incorporation into the soil.
- Pre-Harvest Interval (PHI): 60 days
- Maximum Platinum allowed per growing season: 17 fl. oz./Acre (0.266 lb. a.i./A)

Crop	Pest	Rate Per Acre Per Application
Hops	Garden Symphylan (<i>Scutigerella immaculata</i>) Hop Aphid (<i>Phorodon humuli</i>) Root Weevils	8.0 fl. oz./A

- Application Rate: See rate conversion chart for rate per 1000 linear ft.
- Application Method: Apply a surface band on each side of the row out to the plant canopy drip line or within the vegetation-free herbicide strip (calculated on a broadcast basis, but concentrated in the band). After the application, apply sufficient irrigation to incorporate the product into the plant's root zone, on the same day as the application.
- Pre-Harvest Interval (PHI): 65 days
- Maximum Platinum allowed per growing season: 8 fl. oz./Acre (0.125 lb. a.i./A)

Сгор	Pest	Rate Per Acre Per Application
Leafy Vegetables		
, ,	Aphids	5.0 – 11.0 fl. oz./A
Amaranth	Flea Beetles	
Arugula	Leafhoppers	
Cardoon	Leafminers ¹	
Celery	Whiteflies	
Celtuce		
Chinese celery		
Chrysanthemum:		
edible-leaved & garland	İ	
Corn Salad		
Cress: Garden & upland		
Dandelion		
Dock		
Endive		
Fennel		
Lettuce: Head & Leaf		
Orach		
Parsley		
Purslane: Garden & Winter		
Radicchio		
Rhubarb		
Spinach (including New		
Zealand & Vine)		
Swiss chard		

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1000 linear ft.
- Application Method: Apply specified dosage in sufficient water volume to ensure uniform application and incorporation into the soil using one of the following methods:
 - 1. In-furrow spray at the seeding or transplant depth, or a narrow surface band above the seedline during planting. For surface-banded applications, incorporate to the seeding depth with sufficient sprinkle or drip irrigation within 24 hours.
 - 2. Post seeding, transplant, or hill drench using sufficient water volume to ensure incorporation into the root zone.
 - 3. In trickle or drip irrigation water.
 - 4. Shanked into the root zone after establishment or transplanting using fertilizer knives or other similar equipment. After application, incorporate with enough irrigation to move the chemical to the root zone.
- For planting systems where multiple rows are planted on beds, apply Platinum according to one of the above methods.
- Pre-Harvest Interval (PHI): 30 days
- Maximum Platinum allowed per growing season: 11 fl. oz./Acre (0.172 lb. a.i./A)
- Pest Control: 1/Suppression

Crop	Pest	Rate Per Acre Per Application
Root Vegetables Subgrou	p (Except Sugarbeets)	
Radish	Aphids Flea Beetles Leafhoppers Whiteflies	5.0 – 6.5 fl. oz./A
Carrot Celeriac Chicory Edible Burdock Garden Beet Ginseng Horseradish Oriental Radish Parsnip Rutabaga Salsify: Black Salsify Spanish Salsify Skirret Turnip Turnip Rooted Chervil Turnip Rooted Parsley	Aphids Flea Beetles Leafhoppers Whiteflies	5.0 12.0 fl. oz./A

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1000 linear ft.
- Application Method: At seeding or within 24 hours of seeding, apply specified dosage in sufficient
 water volume to ensure uniform application and incorporation into the soil using one of the following
 methods:
 - 1. In-furrow spray at the seeding or as a narrow surface band above the seedline during planting. For surface-banded applications, incorporate to the seeding depth with sufficient sprinkle or drip irrigation within 24 hours.
 - Immediately after seeding using sufficient water volume to ensure incorporation into the seed zone.
 - 3. In trickle or drip irrigation water,
- For planting systems where multiple rows are planted on beds, apply Platinum according to one of the above methods.
- Maximum Platinum Allowed per Growing Season:

Radish - 6.5 fl. oz./Acre (0.1016 lb. a.i.)/A

Other Root Vegetables - 12.0 fl. oz./Acre (0.188 lb. a.i./A)

Сгор	Pest	Rate Per Acre Per Application
Strawberry	Aphids Grubs Leafhoppers Strawberry Root Weevil Whiteflies	5.0 – 12.0 fl. oz./A

- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1000 linear ft.
- Application Method: Apply specified dosage in sufficient water volume to ensure uniform application and incorporation into the soil using one of the following methods:
 - In-furrow spray at the transplant depth, or a narrow surface band above the transplant during planting. For surface-banded applications, incorporate to root depth with sufficient sprinkle or drip irrigation within 24 hours.
 - Post transplant drench using sufficient water volume to ensure incorporation into the root zone.
 - 3. In trickle or drip irrigation water.
 - 4. As a plant hole treatment, just prior to, or during, transplant
- Pre-Harvest Interval: 50 days
- Maximum Platinum Allowed per Growing Season: 12 fl. oz./Acre (0.188 lb. a.i./A)

Crop	Pest	Rate Per Acre Per Application
Tobacco	Aphids	0.5-1.3 fl. oz./1,000 plants
	Flea Beetles Japanese Beetles	0.8-1.3 fl. oz./1,000 plants
	Thrips (Suppression)	0.8 fl. oz./1,000 plants
	Mole Crickets Thrips Whiteflies Wireworms	1.3 fl. oz./1,000 plants

- Application Timing: Make only one soil or tray treatment application per season.
- Application Rate: Use lower rates for short residual control and higher rates for long residual control.
- Application Method: Apply at transplant using one of the methods described below. Apply specified dosage in sufficient water volume to ensure uniform application using one of the following methods:
 - Tray treatment: Apply to transplants while still in trays. Thoroughly water transplants. Then
 apply the chemical evenly to the transplants. Immediately after treatment, spray transplants
 with enough water to wash the chemical off the foliage and into the soil. Set transplants in
 the field within two days after treatment. During transplanting, workers handling transplants
 must wear waterproof gloves. Do not apply Platinum to float-bed water.
 - 2. Mix appropriate amounts of Platinum in water and drench transplants as they are being placed in the ground.
- Maximum Platinum Allowed per Growing Season: 8 fl oz. (0.125 lb. a.i.)/A

Crop	Pest	Rate Per Acre Per Application		
Tuberous and Corm Vegetables Arracacha Arrowroot Canna Cassava: bitter and sweet Chayote (root) Chinese artichoke Chufa Dasheen Ginger Jerusalem artichoke Leren Potato Sweet potato Tanier Turmeric Yams Yam bean	Aphids Flea Beetles Colorado Potato Beetles Potato Leafhoppers Potato Psyllid Wireworm (Seed Piece only)	5.0 – 8.0 fl. oz./A		

- Application Timing: Make only one soil application per season.
- Application Rate: Use lower rates for short residual control and higher rates for long residual control. See rate conversion chart for rate per 1,000 linear ft.
- Applicatoin Method: Apply using one of the following methods:
 - An in-furrow spray during planting. For best results, spray directly on the seed pieces in the furrow. Apply in sufficient water to ensure good coverage of seed pieces.
 - 2. Apply specified amount of Platinum impregnated on dry granular fertilizer before or during planting.
 - 3. Apply at plant emergence. Direct spray at the soil near the base of the plant during the last hilling operation. Incorporate into the root zone with sufficient overhead irrigation within 24 hours.
 - 4. Apply as a broadcast spray to the soil during the last hilling operation. Incorporate into the root zone with sufficient overhead irrigation within 24 hours.
- Maximum Platinum Allowed per Growing Season: 8 fl. oz. (0.125 lb. a.i.) /A

Platinum Conversion Chart for Linear Application

Rate Per Acre		Rate in f	l. oz. of pr	oduct per	1,000 lin	ear feet f	or specif	ied row s	pacing a	nd rate p	er acre		Lb. a.i./A
Row Spacing	20"	30"	34"	36"	38"	40"	46"	60"	72"	78"	80"	84"	
Linear Ft./Acre	26,136	17,424	15,374	14,520	13,756	13,068	11,363	8,712	7,260	6,702	6,534	6,223	
5 fl. oz./A	0.19	0.29	0.33	0.34	0.36	0.38	0.44	0.57	0.69	0.75	0.77	0.80	0.079
6 fl. oz./A	0.23	0.34	0.39	0.41	0.44	0.46	0.53	0.69	0.83	0.90	0.92	0.96	0.094
7 fl. oz./A	0.27	0.40	0.46	0.48	0.51	0.54	0.62	0.80	0.96	1.04	1.07	1.12	0.1094
8 fl. oz./A	0.31	0.46	0.52	0.55	0.58	0.61	0.70	0.92	1.10	1.19	1.22	1.29	0.125
9 fl. oz./A	0.34	0.52	0.59	0.62	0.65	0.69	0.79	1.03	1.24	1.34	1.38	1.45	0.1406
10 fl. oz./A	0.38	0.57	0.65	0.69	0.73	0.77	0.88	1.15	1.38	1.49	1.53	1.61	0.1563
11 fl. oz./A	0.42	0.63	0.72	0.76	0.80	0.84	0.97	1.26	1.52	1.64	1.68	1.77	0.1719
12 fl. oz./A	0.46	0.69	0.78	0.83	0.87	0.92	1.06	1.38	1.65	1.79	1.84	1.93	0.1875
13 fl. oz./A	0.50	0.75	0.85	0.90	0.95	0.99	1.14	1.49	1.79	1.94	1.99	2.09	0.2031
14 fl. oz./A	0.54	0.80	0.91	0.96	1.02	1.07	1.23	1.61	1.93	2.09	2.14	2.25	0.2188
15 fl. oz./A	0.57	0.86	0.98	1.03	1.09	1.15	1.32	1.72	2.07	2.24	2.30	2.41	0.2344
16 fl. oz./A	0.61	0.92	1.04	1.10	1.16	1.22	1.41	1.84	2.20	2.39	2.45	2.57	0.25
17 fl. oz./A	0.65	0.98	1,11	1.17	1.24	1.30	1.50	1.95	2.34	2.54	2.60	2.73	0.2656

ROTATIONAL RESTRICTIONS

Treated areas may be replanted immediately following harvest or as soon as practical following the last application with any crop listed on this label or to sorghum, wheat, barley, canola, cotton, legume vegetables, corn, sunflower, mint (peppermint and spearmint), oilseed crops (rapeseed, Indian rapeseed, Indian mustard seed, field mustard seed, black mustard seed, flax seed, safflower seed, crambe seed and borage seed). Any cover crop planted for erosion control or soil improvement may be planted as soon as practical following the last application. However, the cover crop may not be grazed or harvested for food or feed. For all other crops, a 120-day plant-back interval must be observed.

STORAGE AND DISPOSAL

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

Storage

Store in a cool, dry place.

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.

Pesticide Disposal

Pesticide wastes may be toxic. Improper disposal of unused pesticide, spray mixture, or rinse water is a violation of Federal law. If these wastes cannot be used according to label instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance in proper disposal methods.

Container Disposal

Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities.

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

Manufactured for:

Syngenta Crop Protection, Inc.

Greensboro, North Carolina 27409

www.syngenta-us.com

SCP 939A-L1(draft) (72 fl. oz.)

SCP 939A-L2(draft) (16 fl. oz.)

SCP 939A-L3(draft) [2.5 gals. (320 fl. oz.)]

PLA 939A-L(12-6-06) AMEND0507 CLEAN- pd - 05/22/07 000100-00939 20070522.PLATINUM-0507-CLEAN.pdf

[Non-detachable Container Label 72 oz. and 2.5 gal. (320 oz.)]

Platinum®

Insecticide

GROUP 4A INSECTICIDE

For control of certain insect pests infesting various crops

Active Ingredient:

Thiamethoxam ¹	21.6%
Other Ingredients:	78.4%
Total:	100.0%

¹CAS No. 153719-23-4

Platinum is a soluble concentrate containing 2 pounds of active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use in 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. 100-939

EPA Est. XXXXX

SCP 939A-L1(draft) (72 fl. oz.) SCP 939A-L3(draft) [2.5 gals. (320 fl. oz.)]

72 fl. oz.

2.5 gals. (320 fl. oz.)

Net contents

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

FIRST AID			
If inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice. 		
If in eyes	 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	 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	 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. 		
	NOTE TO PHYSICIAN		

There is no specific antidote if **Platinum** is ingested. Induce emesis or lavage stomach. Treat symptomatically.

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

Environmental Hazards

This pesticide is toxic to wildlife and highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when cleaning equipment or disposing of equipment wash water.

Refer to Surface Water Advisory, Ground Water Advisory, Spray Drift Advisory, Physical and Chemical Hazards, and Storage and Disposal sections in the attached booklet.

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Manufactured for: Syngenta Crop Protection, Inc. Greensboro, North Carolina 27409

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PLA 939A-L(12-6-06) AMEND0507 CLEAN - pd - 05/22/07 000100-00939 20070522 PLATINUM-0507-CLEAN pdf

(Non-detachable Container Front Label 16 oz.)

Platinum[©] Insecticide

GROUP 4A INSECTICIDE

For control of certain insect pests infesting various crops

Active Ingredient:

Thiamethoxam ¹	21.6%
Other Ingredients:	78.4%
Total:	100.0%

¹CAS No. 153719-23-4

Platinum is a soluble concentrate containing 2 pounds of active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use in 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. 100-939 EPA Est. XXXXX

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Manufactured for:
Syngenta Crop Protection, Inc.
Greensboro, North Carolina 27409
Syngenta Crop 33 (20).

SCP 939A-L2(draft)

16 fl. oz. Net Contents (Non-detachable Container Back Label 16 oz.)

KEEP OUT OF REACH OF CHILDREN.

CAUTION

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Harmful if inhaled or absorbed through skin. Causes moderate eye irritation.. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

FIRST AID				
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If on skin or clothing	 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	 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. 			

NOTE TO PHYSICIAN

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HOT LINE NUMBER

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Refer to Surface Water Advisory, Ground Water Advisory, Spray Drift Advisory, Physical and Chemical Hazards, and Storage and Disposal sections in the attached booklet.

SCP 939A-L4(draft)

PLA 939A-L(12-6-06) AMEND0507 CLEAN - pd - 05/22/07 000100-00939 20070522 PLATINUM 0507-CLEAN pdf