

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

FEB 19 2004

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

Subject:

Label Amendment to Add Language for Closed System Package (SMARTBOX)

Force® 3G Insecticide
EPA Reg. No. 100-1075
Vous Submission Dated December 1

Your Submission Dated December 8, 2003

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 subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. Add the following to the first paragraph under Precautionary Statements: "Wash throughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse."
- 2. Under "Conditions of Sale" revise the sentence beginning with "In no event shall Syngenta or Seller be liable for... to read "To the extent permitted by law Syngenta or Seller shall not be liable for...". As currently written the statement negates and/or detracts from labeling requirements as set forth by the Agency in 40 CFR Part 156, and is, therefore, considered misbranding.
- 3. The preferred placement for the Storage and Disposal statements is at the end of the Directions for Use section. This placement eliminates a break between the heading "Directions for Use" and the body of the use directions.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely

Georgo T. LaRocca

Product Manager (13)
Insecticide Branch

RESTRICTED USE PESTICIDE

DUE TO TOXICITY TO FISH AND AQUATIC ORGANISMS

FOR RETAIL SALE TO AND USE ONLY BY CERTIFIED APPLICATORS, OR PERSONS UNDER THEIR DIRECT SUPERVISION, AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATOR'S CERTIFICATION.

Force® 3G

Insecticide

For Use to Control Insects on Field Corn, Popcorn, Seed Corn and Sweet Corn

Active Ingredient:

Tefluthrin: (2,3,5,6-tetrafluoro-4-methylphenyl)methyl-

 $(1a,3a)-(Z-(\pm)-3-(2-chloro-3,3,3-trifluoro-$

1-propenyl)-2,2-dimethylcyclopropanecarboxylate 3.0%
Other Ingredients: 97.0%
Total: 100.0%

Contains 3 lbs. active ingredient per 100 lbs. of granular insecticide.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use in booklet.

EPA Reg. No. 100-1075

EPA Est. XXXX

Product of XXXX Formulated in the USA

SCP 1075A-M (DRAFT SMARTBOX)

ACCEPTED
with COMMENTS
in EPA Letter Dated

Under the Feberal Insecticide. Furgicide, and Rodenticide Act. as amended, for the pesticide registered under EPA Reg. No.

Net Weight

	FIRST AID						
	Contains a Pyrethroid Insecticide (Tefluthrin)						
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.						
lf on skin or	Take off contaminated clothing.						
clothing	Rinse skin immediately with plenty of water for 15-20 minutes.						
	Call a poison control center or doctor for treatment advice.						
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 further 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 the poison control						
	center or doctor.						
	Do not give anything by mouth to an unconscious person.						
•	container or label with you when calling a poison control center or						
doctor, or going for							
	HOT LINE NUMBER						
	Hour Medical Emergency Assistance (Human or Animal) or						
Chemical Emergency Assistance (Spill, Leak, Fire, or Accident)							
Call							
1-800-888-8372							

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

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

Skin exposure may result in a transient sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours without apparent skin damage. Wash exposed areas once with soap and water. Relief from the skin sensation may be obtained by applying an oil-based cream.

Personal Protective Equipment (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride
- · 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.

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.

Engineering Controls (SMARTBOX only)

This product is formulated into a "SMARTBOX" system that meets the definition of a closed loading system as defined by the Worker Protection Standard for Agricultural Pesticides.

Important: When reduced PPE is worn because a closed system is being used, handlers must be provided with all PPE specified above for "Applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

User Safety Recommendations

Users should:

- Remove PPE immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is very highly toxic to freshwater and estuarine fish and invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water, or 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 water.

Endangered Species Restrictions

This product may pose a hazard to endangered aquatic species. Follow all use directions.

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 Limitation 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

RESTRICTED USE PESTICIDE

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

Force 3G should be used only in accordance with recommendations on this label or in separately published Syngenta supplemental labeling recommendations for 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), notification to workers, and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

The REI for this product is zero hours.

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

SMARTBOX Information (SMARTBOX only)

Please refer to the SMARTBOX manual for information on system operation and calibration.

- Do not attempt to open or tamper with the container.
- Do not attempt to repair the SMARTBOX application system. If repairs are necessary, contact your Sales Representative or the manufacturer of the application system.

STORAGE AND DISPOSAL

Prohibitions

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

Storage

Do not store or use in or around the home. Store in original containers only. In case of spill on floor or paved surfaces, sweep up and remove to chemical waste area.

Pesticide Disposal

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

Container Disposal (Bags)

Completely empty bag into application equipment. When bag is empty, dispose of in a sanitary landfill, or, by other procedures allowed by State and local authorities.

Container Return (SMARTBOX)

- Do not discard the SMARTBOX container. All SMARTBOX containers must be returned per the instructions provided.
- Do not attempt to open or tamper with the container.
- Once empty, containers are not intended for re-use.

GENERAL INSTRUCTIONS

Runoff from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Do not apply this product within 20 yards of water (lakes, reservoirs, rivers, permanent streams, marshes, estuaries, natural ponds, or ponds used for commercial fishing).

Cover or incorporate spills (including end row spillage).

Rotational crops may be planted no sooner than 30 days after application.

DIRECTIONS FOR APPLICATION

At-Planting Band Treatment

Apply Force 3G insecticide at planting time. Place the granules in a 7-inch wide band over the row behind the planter shoe, and in front of or behind the press wheel.

GRANULES MUST BE INCORPORATED INTO THE TOP ONE INCH OF SOIL USING TINES, CHAINS OR OTHER SUITABLE EQUIPMENT.

DO NOT apply this product as either a band or T-band treatment, unless you can incorporate the granules as directed above. This will improve insect control and reduce the potential for adverse effects to aquatic organisms.

Highly Erodible Land (HEL)

When used on erodible soils, best management practices for minimizing runoff should be employed. On highly erodible land draining to water bodies, Syngenta recommends consultation with the Natural Resources Conservation Service (NRCS) and/or other agricultural agencies to ensure that effective efforts are made to minimize soil erosion as well as runoff of herbicides and insecticides. In particular, where highly erodible land (HEL) is adjacent to aquatic bodies, the 20-yard buffer/setback area should be left in grass or other natural vegetation.

For **NO-TILL** corn where runoff drains into adjacent or neighboring aquatic sites (ponds, streams, lakes), apply Force 3G as an in-furrow treatment only. See in-furrow directions below.

At-Planting In-Furrow Treatment

Apply Force 3G at planting time as an in-furrow treatment for control of corn rootworms, wireworms, and seed corn maggots. In-furrow applications may be made by (1) directing the granules into the planter shoe with the seed, or (2) placing the applicator tube directly behind the planter shoe so that the granules drop into the seed furrow.

CALIBRATION TABLE

Amount of Force 3G/ 1,000 ft. of row		Pounds of	Force 3G Req	uired Per Acı	e for Various	Row Spacin	gs
	40"	38"	36"	34"	32"	30"	Row Spacing
[13,068	13,756	14,520	15,374	16,335	17,424	Linear Ft./A
3 oz.	2.5	2.6	2.8	2.9	3.1	3.3	
4 oz.	3.3	3.4	3.6	3.8	4.1	4.4	1
5 oz.	4.1	4.3	4.5	4.8	5.1	5.5	1

GAUGE SETTINGS FOR FORCE 3G INSECTICIDE APPLICATION (Bags only)

Speed MPH		4		5		6		7		8					
APPLICATION RATE/1,000		,				j									
Row Feet (Oz./1,000 Row Feet)	3	4	5	3	4	5	3	4	5	3	4	5	3	4	5
Applicator								444							
Kinze	6_	8	10	8	10	12	9	11	13	11	13	15	13	14	17
Allis Chalmers (new, with noble metering unit)	*	8	9	*	*	*	*	10	12	*	*	*	*	12	14
Buffalo (10-20-30-40)	*	6	7	*	*	<u> </u>	٠	9	11		*	*	<u> </u>	9	11_
Buffalo (fluted-roll feed-revolutions on hexagonal adjusting nut)	*	41/4	5½	UNIFORM FLOW AT ALL SPEEDS											
Gandy (snap-on and bolt-on bottom models)	13	15	17	15	17	19	16	19	21	17	20	23	19	22	24
International Harvester (one gauge per hopper; Gate/Dial) - Old	1/4	1/6	1/7	1/6	1/7	1/9	1/7	1/8	2/1	1/8	1/9	2/3	2/0	2/1	2/5
International Harvester (two gauges per hopper; Gate/Dial) - New	1/1	1/2	1/3	1/2	1/3	1/5	1/3	1/4	1/6	1/4	1/5	1/7	1/5	1/6	1/9
John Deere 7200/7300 MaxEmerge®2															
1760 Conservation Planter	11	13	15	13	15	17	14	17	20	16	19	24	17	22	27
John Deere 7000 MaxEmerge (Even) (0-10-20-30-40)	7	9	11	9	11	13	11	12	14	12	14	16	14	15	18
John Deere 7000 MaxEmerge (Odd) (5-15-25-35-45)	7	8	9	8	9	11	10	11	13	12	13	15	13	14	16
John Deere MaxEmerge (adjustable dial 0-79)	11	13	15	13	15	17	14	17	20	16	19	24	17	22	27
John Deere (metal box with 3 range settings and dial; Range/Notch)	¹ / ₂₄	1/25	1/28	¹ / ₂₆	1/28	1/31	1/28	1/30	²/ ₃	1/30	² / ₃	²/ ₇	1/33	² / ₅	² / ₁₁
Noble/White Planter (rectangular opening) - New	*	6	7	*	•	*	*	7	9	*	•	*	•	9	11
Noble (round opening) - Old	*	8	9	*	*	<u> </u>	*	11	13	*	*	*	*	14	17
White 5100	6	7	8	7_	8	9	8	9	11	9	10	12	10	12	14
White 6100	6	8	10	8	10	12	9	12	14	10	13	16	12	15	17

NOTE: These settings should be used as starting points only. Continually check the amount of Force 3G used against a known length of row or acreage and make further adjustments accordingly. Also, check calibration occasionally to make sure equipment wear, changing conditions, etc., have not caused a change in flow rate.

Force 3G Rate Recommendations

Time of Application	Insects Controlled	Rate: (oz./1,000 ft. of row)	Application
At Planting	Western Corn Rootworm Northern Corn Rootworm Southern Corn Rootworm Mexican Corn Rootworm Cutworm Seed Corn Maggot Seed Corn Beetle Lesser Cornstalk Borer White Grub ^{1,2} Wireworm ^{1,2}	4-5 Banded, T- banded or In-Furrow	Banded: Place granules in a 7-inch band directly behind planter shoe in front of or behind the press wheel. In-Furrow: Place granules directly in the seed furrow behind the planter shoe.
	Chinch Bug ³ Billbug ³ Red Imported Fire Ant ⁴	4-5 Banded, T- banded	
	Cutworm	3-4 Banded or T- banded Only First year corn only	
At cultivation within 30 days of seedling emergence	Mexican Corn Rootworm Northern Corn Rootworm Southern Corn Rootworm Western Corn Rootworm	4-5	Apply Force 3G by placing the granules at the base of the plant on both sides of the row (split boot). Cover the treated bands with 2-3 inches of soil by making the application ahead of cultivation equipment. Apply Force 3G when activity of rootworm larvae is first observed. Make this application within 30 days of seedling emergence. Do Not apply this product unless you can incorporate the granules as directed above. DO NOT FOLLOW A FORCE 3G AT-PLANTING APPLICATION WITH A LAY-BY APPLICATION. USE FORCE 3G ONLY ONCE PER CROP.

¹Use 5 oz./1,000 ft. of row for heavy infestations ²For best wireworm and/or white grub control, apply the granules as an in-furrow treatment ³Suppression only ⁴Suppression only for 28 days

(Bags)

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(SMARTBOX)

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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

SCP 100-1705A-M (DRAFT SMARTBOX)

FOR 3G-M (DRAFT SMARTBOX) - ig - 12-11-03 000100-01075.20031211.smartbox.PDF