

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 21 2008

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

Subject: Dynasty™ CST Fungicide
EPA Registration Number 100-1177
Your label amendment application dated November 10,
2004

Dear Mr. McCain,

This letter replaces the letter concerning the same product and subject that was sent to you on March 3, 2006. The original letter contains an error in paragraph 1.f. and several typographical errors which are corrected in this replacement letter.

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Make the following changes to the label:

a. In the Ingredient Statement, change the CAS designation for Mefenoxam from "(CAS No. 70630-17-0)" to "CAS No. 70630-17-0 and 69516-34-3)".

b. In the in the first bulleted item in the "User Safety Recommendations" section, change "...eating, drinking chewing gum, using..." to "...eating, drinking, chewing gum, using...".

c. In the "CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY" section, qualify the extent of liability of "Syngenta or Seller" by adding a clause similar to "To the extent allowed by law,". However, this may not be further qualified by limiting "law" to "State law".

d. In the third to the last sentence in the first paragraph of the "GENERAL INFORMATION" section, change "...appear on the tank, mix partner label..." to "...appear on the tank mix partner label...".

e. In the last sentence in the first paragraph of the "GENERAL INFORMATION" section, change "...mixed with any product, which prohibits..." to "...mixed with any product which prohibits..."


f. Change the "GENERAL USE PRECAUTIONS" section to read "Cotton may be replanted immediately after an azoxystrobin treatment. Do not plant any other crop within 45 days after the last treatment of the cotton crop with a product that contains azoxystrobin or after the planting of cotton seeds that have been treated with a product that contains azoxystrobin."

g. IN the third sentence in the third paragraph of the "MIXING INSTRUCTIONS" section, near the bottom of page 7, change "...completely disperse prior by adding Dynasty CST..." to "...completely disperse prior to adding Dynasty CST..."

2. Submit one copy of your final printed label before you release product bearing this amended labeling for shipment.

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

Sincerely yours,



Tony Kish
Product Manager (Team 22)
Fungicide Branch
Registration Division (7505C)

Attachments: Label stamped "ACCEPTED with COMMENTS"
Health Effects Division review



3/12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Michele A. Schulz
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, North Carolina 27419-8300

Subject: Dynasty™ CST Fungicide
EPA Registration Number 100-1177
Your label amendment application dated November 10,
2004

Dear Ms. Schulz,

We amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Make the following changes to the label:

a. In the Ingredient Statement, change the CAS designation for Mefenoxam from "(CAS No. 70630-17-0)" to "CAS No. 70630-17-0 and 69516-34-3)".

b. In the in the first bulleted item in the "User Safety Recommendations" section, change "...eating, drinking chewing gum, using..." to "...eating, drinking, chewing gum, using...".

c. In the "CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY" section, qualify the extent of liability of "Syngenta or Seller" by adding a clause similar to "To the extent allowed by law,". However, this may not be further qualified by limiting "law" to "State law".

d. In the third to the last sentence in the first paragraph of the "GENERAL INFORMATION" section, change "...appear on the tank, mix partner label..." to "...appear on the tank mix partner label...".

e. In the last sentence in the first paragraph of the "GENERAL INFORMATION" section, change "...mixed with any product, which prohibits..." to "...mixed with any product which prohibits...".

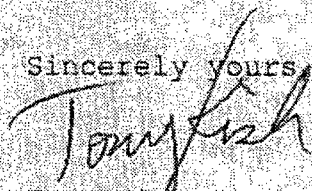
f. Change the "GENERAL USE PRECAUTIONS" section to read "Peanuts may be replanted immediately after an azoxystrobin treatment. Do not plant any other crop within 45 days after the last treatment of the peanut crop with a product that contains azoxystrobin or after the planting of peanut seeds that have been treated with a product that contains azoxystrobin."

g. IN the third sentence in the third paragraph of the "MIXING INSTRUCTIONS" section, near the bottom of page 7, change "...completely disperse prior by adding Dynasty CST..." to "...completely disperse prior to adding Dynasty CST..."

2. Submit one copy of your final printed label before you release product bearing this amended labeling for shipment.

If you have any questions about this letter, please contact John Bazuin at (703)305-7361.

Sincerely yours,



Tony Kish
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Attachments: Label stamped "ACCEPTED with COMMENTS"
Health Effects Division review

GROUP 4, 11, 12 FUNGICIDES

Dynasty™ CST

Fungicide

Broad-spectrum seed treatment fungicide for control of seed and seed borne diseases.

Active Ingredients :	
Azoxystrobin ¹	6.64%
Fludioxonil ²	1.11%
Mefenoxam ³	3.32%
Other Ingredients:	88.93%
Total:	100.00%

¹(CAS No. 131860-33-8)
²(CAS No. 131341-86-1)
³(CAS No. 70630-17-0)

Contains 0.63 pound azoxystrobin, 0.10 pound fludioxonil, and 0.31 pound mefenoxam per gallon.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-1177

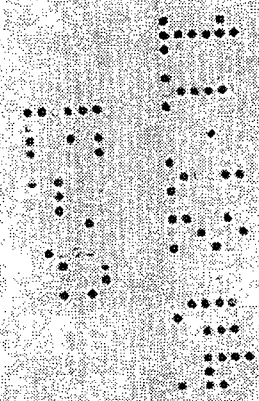
Product of the United Kingdom and Switzerland
Formulated in the USA

SCP 1177A-M

Net Contents

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAR 3 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

100-1177



FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none">• 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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372	

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

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options follow the instructions for Category C 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 polyvinyl chloride, nitrile rubber, or butyl rubber.
- Shoes plus socks

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

Engineering Control Statements

When handlers use closed systems, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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

Azoxystrobin in this product can be persistent for several months or longer. Azoxystrobin has degradation products, which have properties similar to chemicals, which are known to leach through soil to groundwater under certain conditions as a result of agricultural use. Use of azoxystrobin in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Groundwater Advisory Statement

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

This pesticide is toxic to freshwater and estuarine/marine fish and aquatic 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 highwater mark. Do not contaminate water when disposing of equipment washwater or rinsate.

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 Liability, which may not be modified except by written agreement signed by a duly authorized representative of Syngenta.

DIRECTIONS FOR USE

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

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

AGRICULTURAL USE REQUIREMENTS

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

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours. Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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

- Coveralls
- Chemical resistant gloves made of any waterproof material such as polyvinyl chloride, nitrile rubber, or butyl rubber
- Shoes plus socks

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

TREATMENT OF HIGHLY MECHANICALLY DAMAGED SEED, OR SEED OF KNOWN LOW VIGOR AND POOR QUALITY, MAY RESULT IN REDUCED GERMINATION AND/OR REDUCTION OF SEED AND SEEDLING VIGOR. TREAT AND CONDUCT GERMINATION TEST ON A SMALL PORTION OF SEED BEFORE COMMITTING THE TOTAL SEED LOT TO A SELECTED CHEMICAL TREATMENT. DUE TO SEED QUALITY CONDITIONS BEYOND THE CONTROL OF SYNGENTA CROP PROTECTION, NO CLAIMS ARE MADE TO GUARANTEE GERMINATION OF CARRY-OVER SEED.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store in original containers only. Keep container closed when not in use. Do not store near food or feed. In case of spill on floor or paved surfaces, mop and remove to chemical waste storage area until proper disposal can be made if product cannot be used according to the label.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Plastic Containers: Triple rinse (or equivalent); then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or alternatives allowed by State and local authorities.

FOR BULK AND MINIBULK CONTAINERS

CONTAINER DISPOSAL: Reseal container and offer for reconditioning, or triple rinse (or equivalent) and offer for recycling or reconditioning, or clean in accordance with manufacturer's instructions.

CONTAINER PRECAUTIONS: Before refilling, inspect thoroughly for damage, such as cracks, punctures, bulges, dents, abrasions and damaged or worn threads on closure devices.

REFILL ONLY WITH DYNASTY CST. The contents of this container cannot be completely removed by cleaning. Refilling with materials other than Dynasty CST will result in contamination and may weaken container. After filling and before transporting, check for leaks. Do not refill or transport damaged or leaking container.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

GENERAL INFORMATION

Dynasty CST is a broad spectrum, preventative seed treatment fungicide with systemic and contact properties recommended for the control of many important plant diseases. Dynasty CST may be applied in tank mixes, or sequentially with other registered, seed treatment products. If using Dynasty CST in a tank mixture with other seed treatment products, observe all directions for use, crops/sites, use rates, dilution ratios, precautions, and limitations, which appear on the tank, mix partner label. No label dosage should be exceeded and the most restrictive label precautions and limitations should be followed. This product should not be mixed with any product, which prohibits such mixing.

All applications should be made according to the use directions that follow. If a rate range is specified, use higher rates of Dynasty CST when the disease pressure is expected to be high.

GENERAL USE PRECAUTIONS

Cotton may be replanted immediately after last treatment. Do not plant other crops within 45 days after last application.

RESISTANCE MANAGEMENT

GROUP	4	11	12	FUNGICIDES
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Dynasty CST is a mixture of a Group 4 (mefenoxam), a Group 11 (azoxystrobin), and a Group 12 (Fludioxonil) fungicide. Dynasty CST has three modes of action: (1) Phenylamides- affects RNA Synthesis [Group 4], (2) inhibitor of the Qo (quinone outside) site within the electron transport system (QoI) as well as disrupting membrane synthesis by blocking demethylation [Group 11] and (3) a Phenylpyrrole [Group 12] fungicide. The potential for resistance to non-systemic seed treatment fungicides is extremely low. Systemic seed treatments have the ability to move through the shoot and into the growing plant. If the concentration of the systemic fungicide applied to the seed is low, the potential concentration that could move into the plant would be minimal and would not have any impact on foliar pathogens and resistance. Low rate seed treatments can be followed by a foliar fungicide treatment with the same fungicide chemistry if it is applied at least 3 weeks after planting. Follow the resistance management guidelines for all foliar applications. For fungicide chemistry where there is documented resistance on a specific crop, use a different fungicide chemistry for the first foliar application.

MIXING INSTRUCTIONS

Apply Dynasty CST as a water based slurry using seed treatment application equipment that will provide uniform coverage on the seed surface. Consult the manufacturer of the application equipment being used for calibration and operation procedures.

Dynasty CST mixes easily with water and other water based seed treatments manufactured by Syngenta. When mixing with products from other manufacturers, the compatibility should be tested prior to use by conducting a jar test. Mix all intended seed treatments with the appropriate amount of water in a clear glass container. Mix well and let sit for one hour. Remix and observe for incompatibility.

Mixing Dynasty CST with tank mix partners: Add 1/2 of the required water to the mix tank and turn on the agitation. Mechanical agitation is preferred. If using wettable powders and/or products in water-soluble pouches, add them first to clean water allowing them to completely disperse prior by adding Dynasty CST or other products. Allow each tank mix partner to completely disperse before adding the next product. Add the remaining amount of water and agitate. Maintain agitation until the entire slurry mixture has been used. Allow seed to dry prior to bagging.

Note: Federal law requires that bags of treated seeds shall be labeled with the following information. "This seed has been treated with azoxystrobin, fludioxonil, and mefenoxam

fungicides. Do not use for food, feed or oil purposes. Store away from food and feedstuffs.
Use with an EPA-approved dye that imparts an unnatural color to the seed.

CROP USE DIRECTIONS

Crop	Target Diseases	Use Rate fl. oz product/100 lbs. seed	Remarks
Cotton	Seed-borne and soil-borne fungi causing decay, damping-off, and seedling blight. Seedling damping-off (<i>Rhizoctonia solani</i>) (<i>Pythium</i> spp.) (<i>Fusarium</i> spp.)	3.1 to 3.95	For Black Root Rot control (<i>Thielaviopsis basicola</i>), use Dynasty CST in combination with products containing the active ingredient myclobutanil. Use labeled rates for application as a seed treatment.

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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 1177A-M

DYN CST 1177A-M1.ms 11-04-04

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