

(A) 	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460 Application for Pesticide:	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number 196904
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Section I

1. Company/Product Number 264-508	2. EPA Product Manager Susan Lewis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SYLLIT(R) 65W	PM#	
5. Name and Address of Applicant (Include ZIP Code) Rhone-Poulenc Ag Company P. O. Box 12014, 2 T. W. Alexander Dr. Research Triangle Park, NC 27709 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section II

<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of label changes made in compliance with Wetlands PR Notice 93-3.

NOTIFICATION LABEL NOT REVIEWED PER PR NOTICE 93-3

Section III

1. Material This Product Will Be Packaged In:				DATE: <u>7/12/93</u>
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No * Certification must be submitted.	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Other (_____) <input type="checkbox"/> Stenciled				

Section IV

1 Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Lizbeth R. Simila	Title Associate Registration Manager	Telephone No. (Include Area Code) 919/549-2781
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6 Date Application Received (Stamped)
2 Signature 	3 Title Associate Registration Manager	
4 Typed Name Lizbeth R. Simila	5 Date 6/23/93	

SYLLIT[®] 65W

FRUIT FUNGICIDE

FOR CONTROL OF CERTAIN DISEASES OF APPLES, CHERRIES, PEACHES,
PEARS AND PECANS.

ACTIVE INGREDIENT:

Dodine (n-dodecylguanidine acetate) 65.0%

INERT INGREDIENTS: 35.0%

EPA Reg. No. 264-508

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

PRECAUCIÓN AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
TRANSLATION TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.

For **PRODUCT USE** Information Call 1-800-334-9745

For **MEDICAL** And **TRANSPORTATION** Emergencies **ONLY** Call 24 Hours A Day 1-800-334-7577

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Immediately flush eyes with plenty of water and get medical attention.

IF ON SKIN: Immediately wash skin with plenty of soap and water while removing contaminated clothing and shoes. If irritation develops, seek medical attention.

IF INH/LED: Remove victim to fresh air.

PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Causes eye burns. Avoid contact with eyes, skin and clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating, toileting, or smoking. Remove and wash clothing before reuse. Launder clothing separately from household articles. Replace gloves frequently. Any clothing which has been drenched or heavily contaminated and used gloves must be disposed of in accordance with state or local regulations. Do not contaminate feed and food stuffs. Keep children and domestic animals off treated areas until this material has been washed into the soil. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

PERSONAL PROTECTIVE EQUIPMENT

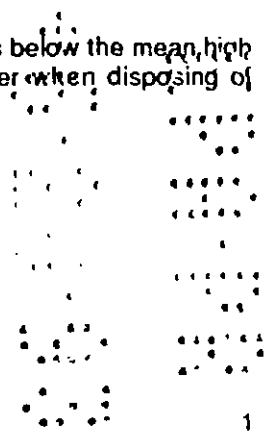
Pesticide Handlers: During mixing/loading of the concentrate, wear a long-sleeved shirt, long-legged pants (or coveralls), chemical-resistant gloves, chemical-resistant shoes, shoe covers, or boots, chemical-resistant apron, and goggles or face shield. During application of the product, wear the same protective clothing, except that a chemical-resistant hat with a wide brim must be worn and the chemical-resistant apron need not be worn. The applicator using an enclosed tractor cab with positive pressure filtration or an enclosed cockpit must wear long pants or coveralls, long-sleeved shirt, socks and shoes. During aerial application in a non-enclosed cockpit, a helmet with a visor may be substituted for the hat and goggles; chemical-resistant shoes, shoe coverings or boots may be omitted.

ENVIRONMENTAL HAZARDS

For terrestrial uses, 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 used for irrigation or domestic purposes. Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift from areas treated.

NOTIFICATION
LABEL NOT REVIEWED
PER FR NOTICE 88-8

DATE 7/12/93



DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

NOTE: Following years of continuous usage of dodine, some strains of apple scab (*V. inaequalis*) have been reported as not being controlled or being dodine resistant. Where this is known or suspected, use an alternate fungicide for control of this disease.

Do not apply this product through any type of irrigation system.

Consult your state experiment station or state extension service for proper timing of sprays. Do not graze cover crops in treated orchards.

FARMWORKER SAFETY STATEMENTS

Do not enter treated areas without protective clothing until sprays have dried.

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Oral warnings must inform workers of areas or fields that may not be entered without specific protective clothing until sprays have dried, and appropriate actions to take in case of accidental exposure, as described under precautionary statements on this label. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: DANGER. Area treated with SYLLIT® 65W on (date of application). Do not enter without appropriate protective clothing until sprays have dried. In case of accidental exposure, flush eyes or skin with plenty of water. Call physician if irritation persists. Remove and wash contaminated clothing before reuse.

EARLY REENTRY

Do not enter or allow entry into treated areas until sprays have dried to perform hand labor tasks. Workers must wear a long-sleeved shirt, long-legged pants (or coveralls), chemical-resistant gloves, socks and shoes for early reentry into treated areas to perform other tasks before sprays have dried.

STORAGE AND DISPOSAL

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

STORAGE INSTRUCTIONS: Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be cool dry area away from any heat or ignition source. Do not allow storage in a damp or humid area. Do not stack over 2 pallets high. Move bags carefully so as not to tear or puncture. Do not move from one area to another unless they are securely sealed to prevent dust from escaping. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Avoid contamination with acids and alkalis. Store in original containers only. If the contents are leaking or material is spilled follow these steps:

1. Collect and place in suitable containers for disposal.
2. Wash area with water and soap to remove remaining pesticide.
3. Follow washing with clear water rinse.
4. Do not allow runoff to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below:

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

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

DILUTE AND CONCENTRATE SPRAYS

SYLLIT® 65W may be used effectively in dilute and concentrate sprays when applied properly to deliver the recommended rate (lb per acre). Trees must be covered uniformly. Fruit and foliage should not be excessively drenched with dilute sprays. Avoid heavy deposits when using concentrate sprays.

INSTRUCTIONS FOR MIXING

SYLLIT 65W, a fine wettable powder, should be added directly to the spray tank when half filled with water. Keep agitator running during filling and spraying. Do not wash wettable powder through filter screen into spray tank.

COMPATIBILITY

Experience indicates that SYLLIT® 65W can be used effectively at recommended dosages with most of the commonly used fungicides, insecticides and acaricides such as:

azinphosmethyl	ferbam
carbaryl	malathion
chlorbenside	phosmet
diazinon	phosphamidon
dicofol	propargite
dimethoate	ryania
dinocap	sulfurs
endosulfan	

While SYLLIT® 65W has been used satisfactorily with emulsifiable concentrate formulations and flowable (water-based) emulsions, it is desirable to check the compatibility of this type combination before materials are mixed in the spray tank. SYLLIT® 65W is not compatible with chlorobenzilates, Bordeaux mixtures, fixed copper, lime or lime sulfur. Observe all cautions and limitations on labeling of all products used in mixtures.

SYLLIT® 65W AND OIL

Tank-mix combinations of SYLLIT® 65W and oils of 60-75 viscosity have been used effectively as a delayed dormant application on apples. Oils of the slow-breaking type are suggested for tank mixing with SYLLIT® 65W. Liquid concentrate or flowable (water-based) emulsion formulations of the phosphate insecticides have been used satisfactorily in SYLLIT® 65W oil systems. Wettable powder formulations of azinphosmethyl, carbophenothion and certain other insecticides have appeared suitable in limited trials. SYLLIT® 65W oil mixtures are not compatible with wettable powder malathion, carbaryl, ferbam and sulfurs.

Because uniform dispersibility and sprayability may be influenced by the particular oil or phosphate insecticide formulation used or by the local water supply, it is recommended that compatibility be determined before adding pesticides to the spray tank.

PROCEDURE FOR TANK-MIXING SYLLIT® 65W INSECTICIDE AND OIL

1. SYLLIT® 65W should be added to the tank when 1/4 to 1/2 full with water and allowed to mix thoroughly.
2. If insecticide is used, add as tank is filling.
3. Add self-emulsifying oil last when tank is nearly 3/4 full.

Consult your state agricultural experiment station or state extension service for information on self-emulsifying oils and pesticide formulations for tank mixing with SYLLIT® 65W.

APPLE: Scab - Protection Schedule (Ground Application) - Use 1-2 lbs. per acre of SYLLIT® 65W at 5 to 7 day intervals or as needed to maintain scab control prebloom through the first cover applications. Use 1 lb. per acre SYLLIT® 65W in subsequent cover sprays as needed.

SYLLIT® 65W may be used in a delayed dormant oil schedule. Use 1 to 2 lbs. SYLLIT® 65W with 8 gallons of oil of 60-75 viscosity per acre. For mixing instructions, refer to SYLLIT® 65W and OIL section on label.

(Air Application) Use 1 1/2 lbs. SYLLIT® 65W per acre in 5 to 7 gallons of spray at 5 to 7 day intervals or as needed to maintain scab control from prebloom through the first cover sprays. Repeat application in subsequent cover sprays as needed.

"After-infection" Applications - After an infection period has occurred, use 3 lbs. per acre SYLLIT® 65W during or following a rain from prebloom through first cover applications and, in later cover sprays, as needed. While timing of the spray may vary considerably depending upon temperatures, it is recommended that application be made within 36 hours, from the beginning of the rain or wet period which caused the infection.

Do not apply within 7 days of harvest.

Wettable sulfur can be used in combination with SYLLIT® 65W for control of powdery mildew on apples. Consult your state extension service for proper rates and timing of sprays.

SYLLIT® 65W TREATED APPLES SHOULD NOT BE USED IN THE MANUFACTURE OF APPLE POMACE FOR USE IN LIVESTOCK FEEDS. SUCH USE MAY RESULT IN ILLEGAL RESIDUES IN MILK OR MEAT.

Fruit color and finish on most apple varieties sprayed with SYLLIT® 65W at recommended dosages have frequently been outstanding.

SYLLIT® 65W may cause russetting of Golden Delicious and Grimes Golden apple varieties if applied during cool, slow drying weather conditions. Do not use on these varieties under these conditions.

Freezing or near-freezing temperatures, particularly when accompanied by slow-drying conditions may injure apple fruit or predispose the fruit to chemical injury. Do not exceed 2 lbs. SYLLIT® 65W per acre immediately before, during or immediately after occurrence of such conditions.

CHERRY (SOUR AND SWEET): Leaf Spot - Use 1 to 2 lbs. SYLLIT® 65W per acre at petal fall or when first leaves unfold. Repeat application thereafter at 7 to 10 day intervals. If conditions favor leaf spot, continue applications through harvest.

Post-Harvest Sprays: Apply 1 to 2 lbs. SYLLIT® 65W per acre immediately after harvest and as needed.

Blossom Brown Rot (Western States Only): Use 2 lbs. SYLLIT® 65W per acre at the time petals begin to open. Repeat application at full bloom and again at petal fall.

Wettable sulfur can be used in combination with SYLLIT® 65W for control of powdery mildew on cherries. Consult your state extension service for proper rates and timing of sprays.

Applications of SYLLIT® 65W to cherries when temperatures and humidity are excessively high may cause spotting to foliage or fruit.

PEACH: Bacterial Spot - Under light to moderate disease conditions, use 2 lbs. SYLLIT® 65W and 4 lb. captan (50%) per acre (use 1/2 lb. SYLLIT 65 and 4 lbs. captan (50%) per 100 gallons of spray) at shuck-split and repeat application at 7 to 10 day intervals through the cover sprays. Shorten intervals during wet periods as needed to maintain maximum protection against infection.

Do not use concentrate sprays higher than 3x.

Do not apply within 15 days of harvest.

Captan or the SYLLIT-captan mixture is toxic to fish. Do not contaminate any body of water.

Limited experience indicates that wettable powder formulations of azinphosmethyl, dicofol, tetradifon, and endosulfan are compatible with the mixture. Do not combine SYLLIT® 65W and captan with solvent formulations of insecticides or sulfur. Spray injury may result if the combination is applied with, immediately before, or closely after an oil or zinc sulfate-lime spray.

PEACH: Leaf Curl (Western States Only) - Use 4 lbs. SYLLIT® 65W per acre just before buds swell in the spring. If leaf curl was moderate to severe the previous season, use 4 lbs. SYLLIT® 65W per acre 1 month before buds swell in the spring and again just prior to bud swelling.

Blossom Brown Rot (Western States Only) - Use 2 lbs. SYLLIT® 65W at the time petals begin to open. Repeat applications at full bloom and again at petal fall.

Do not apply after petal fall.

PEAR: Scab (Western States Only) Use 3 lbs. SYLLIT® 65W per acre of spray at 5 to 7 day intervals or as needed to maintain scab control from prebloom through petal fall and again in first cover. Use 2 to 3 lbs. SYLLIT® 65W in subsequent sprays as needed.

Do not apply within 7 days of harvest.

(Air Application - Oregon Only) - Use 2 to 3 lbs. SYLLIT® 65W per acre in 5 to 7 day intervals or as needed to maintain scab control from prebloom through the first cover sprays. Repeat application in subsequent cover sprays as needed.

Do not apply within 7 days of harvest.

PECANS: Scab, liver spot, brown leaf spot, downy leaf spot, leaf blotch, downy mildew - (Ground Application) - Use 2 to 4 lbs. SYLLIT® 65W per acre of spray. Begin applications when first leaves are showing and repeat at 10 to 14 day intervals through first cover. Repeat applications at 2 to 3 week intervals or as needed to maintain disease control.

(Air Application) Use 2 lbs. SYLLIT® 65W per acre in a minimum of 20 gallons of spray. Begin applications when first leaves are showing and repeat at 10 to 14 day intervals through first cover. Repeat application at 2 to 3 week intervals or as needed to maintain disease control. Under severe scab conditions, use 4 lbs. SYLLIT® 65W per acre in a minimum of 20 gallons of spray.

Do not apply after shucks have started to open.

Do not graze meat or dairy animals in treated groves.

SYLLIT® 65W has been used effectively on most pecan varieties. Severe foliage injury has been experienced on Moore and Dan Demar in the Southeast.

STRAWBERRY: Leaf Scorch, Leaf Spot and Leaf Blight - Use 1 1/2 to 2 lbs. SYLLIT® 65W per acre in sufficient water (250 - 300 gallons) for thorough plant coverage. Make first application as soon as new growth starts and repeat sprays at weekly intervals.

Do not apply within 14 days of harvest.

BLACK WALNUT: Anthracnose (Leaf Blight) - Use 4 lbs. SYLLIT® 65W per acre when first leaves unfold. Repeat application at 10 to 14 day intervals. Do not graze meat or dairy animals in treated groves.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use when it is used in accordance with such directions; and (c) that the directions, warning and other statements on this label are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and of residues on food crops and upon reports of field experience. Tests have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, DIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

Rhône-Poulenc Ag Company
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709

SYLLIT is a registered trademark of Rhône-Poulenc.
SYLLIT® 65W (MASTER) Notification 6/23/93.



RHÔNE-POULENC AG COMPANY

June 23, 1993

Ms. Susan Lewis
U. S. Environmental Protection Agency
Office of Pesticide Programs-H7505C
Registration Division
Document Processing Desk (AMEND)
Crystal Mall Building 2, Room 266A
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Lewis:

RE: SYLLIT® 65W
EPA Reg. No. 264-508

In compliance with PR Notice 93-3, Label Statement Prohibiting Applications to Water (Wetlands), this letter along with five copies of the label serves as notification that the ENVIRONMENTAL HAZARDS section of the label has been revised to include the statement "For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark." This is the only change made to the label at this time.

Please contact me at 919/549-2787 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads 'Lizbeth R. Simila'.

Lizbeth R. Simila
Associate Registration Manager