



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 10 1993

Lizbeth R. Simila
RHONE-POULENC AG COMPANY
P.O. Box 12014
Research Triangle Park, NC 27709

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/19/93 in Response to PR Notice 93-7
EPA Reg. No. 264-508
DODINE 65W

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 80% recycled fiber

Each notification must include the following information:

- 1. Registrant 's name and address.
- 2. EPA Registration number of the product for which the labeling was submitted.
- 3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

- 1. Quantity of the product that has been sold or distributed.
- 2. EPA Producing Establishment number.
- 3. Location of the product, if known.
- 4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
 Compliance Division, (7203)
 Worker Protection Notification
 Office of Compliance Monitoring
 U.S. Environmental Protection Agency
 401 M Street SW
 Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling as amended

AND

- **WITHIN** one year from date of this acceptance.

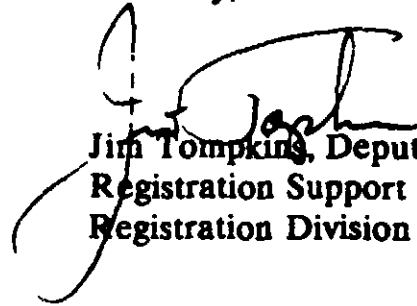
Submit the final printed labeling via the U.S. Postal Service to:

**Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001**

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

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

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

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 INHALED: 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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators and other handlers who may be exposed to the concentrate must wear long-sleeved shirt and long pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, chemical-resistant headgear for overhead exposure, chemical-resistant apron when mixing or loading and dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. 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, 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

Do not apply directly to any body of water. 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.

ACCEPTED
with COMMENTS
in EPA Letter Dated

FEB 10 1988

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

264-508

BEST AVAILABLE COPY

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.

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

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 agriculture pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and expectations pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry intervals. 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.

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, waterproof gloves, shoes plus socks and protective eyewear.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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 in a 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.

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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	phoxmet
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 labels 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 interval 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 Da Deman 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.

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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, or 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 OF 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, INDIRECT 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.

BEST AVAILABLE COPY

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 (PENDING) Submitted ___/___/93.

PM 21

264-508

Labeling
Page 1 of 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 10 1993

Lizbeth R. Simila
RHONE-POULENC AG COMPANY
P.O. Box 12014
Research Triangle Park, NC 27709

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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AND

- **WITHIN** one year from date of this acceptance.

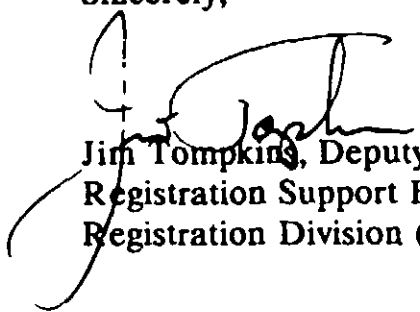
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Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

RHONE-POULENC AG COMPANY
DODINE 65W
264-508 07/19/93

Original Submission

The requirement under the heading "Personal Protective Equipment" must state: "Applicators and other handlers must wear:". Cross out your lead-in statement and replace it with correct one. EXCEPTION: If you have an entirely separate PPE section specifying what "Mixers and loaders must wear", the requirement under the heading "Personal Protective Equipment" must state: "Applicators and other handlers (other than mixers and loaders) must wear:". Cross out your lead-in statement and replace it with the correct one.

The bodywear requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is incorrect. Remove the incorrect requirement and add "Coveralls over long-sleeved shirt and long pants." The exact location is shown in Sections A and B on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The bodywear requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Coveralls over long-sleeved shirt and long pants." The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The footwear requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Chemical-resistant footwear plus socks." The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The headgear requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Chemical-resistant headgear for overhead exposure." The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

6 of 10

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

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

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 INHALED: 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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators and other handlers who may be exposed to the concentrate must wear long-sleeved shirt and long pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear, chemical-resistant headgear for overhead exposure, chemical-resistant apron when mixing or loading and dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. 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, 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

Do not apply directly to any body of water. 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.

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 10 1999

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

264-508

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DIRECTIONS FOR USE

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

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.

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 regulations.

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 expectations pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry intervals. 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.

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, waterproof gloves, shoes plus socks and protective eyewear.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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 in a 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 labels 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 interval 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 interval 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 azirphosmethyl, 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 Daman 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 (25 - 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.

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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, or 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 OF 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, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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

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