

264-997

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MAY 17 2011

Jamin Huang, Ph.D  
Bayer CropScience  
P.O. Box 12014  
2 T.W. Alexander Drive  
Research Triangle Park, NC 27709

SUBJECT: Label Amendment  
Raxil MD Extra W Seed Treatment  
EPA Reg. No. 264-997; Decision 446616  
Your Submission Dated: February 24, 2011

Dear Dr. Huang:

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

- 1. On page 3 in the Agricultural Use Requirements box, first line add "(WPS)" after Worker Protection Standard.

If you have any questions, Rose Kearns of my staff at 703-305-5611 or via email at [kearns.rosemary@epa.gov](mailto:kearns.rosemary@epa.gov) or myself at 703-308-9443 or via email at [kish.tony@epa.gov](mailto:kish.tony@epa.gov).

Sincerely,

Tony Kish  
Product Manager, Team 22  
Fungicide Branch  
Registration Division (7504P)

# RAXIL<sup>®</sup> MD EXTRA W Seed Treatment

**ACTIVE INGREDIENTS:**

Imidacloprid (1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-Imidazolidinimine).....	1.384%
Tebuconazole (Alpha-[2-(4-chlorophenyl)ethyl]-alpha-(1,1-dimethyl-ethyl)-1H-1,2,4-triazol-1-ethanol).....	0.415%
Metalaxyl: (N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester).....	0.560%
Imazalil (1-(2-(2,4-dichlorophenyl)-2-(2-propenyloxy)ethyl)-1H Imidazole).....	0.965%
<b>INERT INGREDIENTS:</b> .....	<b>96.676%</b>

**TOTAL 100.00%**

EPA Reg. No. 264-997

EPA Est.

## KEEP OUT OF REACH OF CHILDREN CAUTION

For **MEDICAL** And **TRANSPORTATION** Emergencies **ONLY** Call 24 Hours A Day 1-800-334-7577  
For **PRODUCT USE** Information Call 1-866-99BAYER (1-866-992-2937)

### FIRST AID

<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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In case of emergency call toll free the Bayer CropScience Emergency Response Telephone No. 1-800-334-7577. Have a product container or label with you when calling a poison control center or doctor, or going for treatment.

### PRECAUTIONARY STATEMENTS

#### CAUTION

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

#### 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.

**All handlers must wear:** Long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves (such as nitrile rubber ≥ 14 mils, butyl rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, barrier laminate ≥ 14 mils, polyvinylchloride (PVC) ≥ 14 mils and Viton ≥ 14 mils), except for bag sewers and planters, and Chemical-resistant apron when mixing/loading, cleaning up spills, cleaning equipment, or otherwise exposed to the 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.

### USER SAFETY RECOMMENDATIONS

**Users should:** Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothes. 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. Users should remove clothing/PPE immediately after handling this product. Wash the outside of gloves before removing.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
5-17-2011  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
264-997

## ENVIRONMENTAL HAZARDS

This product is highly toxic to birds and aquatic invertebrates and toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Exposed treated seeds may be hazardous to birds. In the event that treated seeds are spilled and cannot be salvaged, completely cover them with soil. Do not contaminate water when disposing of equipment washwaters or rinsate.

Groundwater Advisory: Metalaxyl 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. Apply this product only as specified on this label.

## 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. 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.

## STORAGE AND DISPOSAL

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

### PESTICIDE STORAGE

Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat.

### PESTICIDE DISPOSAL

This pesticide's wastes are toxic. 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 at the nearest EPA Regional Office for guidance.

### CONTAINER DISPOSAL

#### **Rigid, Non-refillable containers small enough to shake (i.e., with capacities equal to or less than 5 gallons).**

Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Once container is rinsed, offer for recycling if available, or puncture and dispose of in a sanitary landfill or incineration, or if allowed by state and local authorities, by burning. If burned stay out of smoke.

#### **Rigid Non-refillable containers that are too large to shake (i.e., with capacities greater than 5 gallons or 50 lbs)**

##### **Non-refillable Containers**

Non-refillable containers - Do not reuse or refill this container. After emptying product from container, either return container to Bayer CropScience per instructions from Bayer CropScience Customer Service Center (1-800-527-4781), or rinse and either recycle or dispose of the container as follows:

##### Bottom Discharge IBC (e.g. – Schuetz Caged IBC or Snyder Square Stackable)

Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. To pressure rinse the container before final disposal, empty the remaining contents from the IBC into application equipment or mix tank. Raise the bottom of the IBC by 1.5 inches on the side which is opposite of the bottom discharge valve to promote more complete product removal.

Completely remove the top lid of the IBC. Use water pressurized to at least 40 PSI to rinse all interior portions. Continuously pump or drain rinsate into application equipment or rinsate collection system while pressure rinsing. Continue pressure rinsing for 2 minutes or until rinsate becomes clear. Replace the lid and close bottom valve.

##### Top Discharge IBC, Drums, Kegs (e.g.– Snyder 120 Next Gen, Bonar B120, Drums, and Kegs)

Triple rinsing the container before final disposal is the responsibility of the person disposing of the container. To triple rinse the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container at least 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Rinse all interior surfaces. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

Once container is rinsed, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

**Refillable Containers**

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Do not remove tamper evident cables or one way valves or clean the container if the container is equipped with one way valves and refilling or returning is planned. After emptying product from container, either return container to Bayer CropScience per instructions from Bayer CropScience Customer Service Center (1-800-527-4781) or rinse and either recycle or dispose of the container as follows:

Bottom Discharge IBC (e.g. – Schuetz Caged IBC or Snyder Square Stackable)

Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To pressure rinse the container before final disposal, empty the remaining contents from the IBC into application equipment or mix tank. Raise the bottom of the IBC by 1.5 inches on the side which is opposite of the bottom discharge valve to promote more complete product removal. Completely remove the top lid of the IBC. Use water pressurized to at least 40 PSI to rinse all interior portions. Continuously pump or drain rinsate into application equipment or rinsate collection system while pressure rinsing. Continue pressure rinsing for 2 minutes or until rinsate becomes clear. Replace the lid and close bottom valve.

Top Discharge IBC, Drums, Kegs (e.g. – Snyder 120 Next Gen, Bonar B120, Drums, and Kegs)

Triple rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To triple rinse the containers before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container at least 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Rinse all interior surfaces. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

Once container is rinsed, offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration.

**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 exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours. Exception: Once the seeds are planted in soil or other planting media, workers may enter the treated area without restriction if there will be no contact with the soil/media subsurface. Personal protective equipment required for early entry to treated areas that involve contact with anything that has been treated is: coveralls, shoes plus socks, chemical-resistant gloves made of any waterproof material, and protective eyewear.

**SEED LABELING**

**Seed that has been treated with this product that is packaged or bagged for future use must contain the following labeling:**

“This bag contains seed treated with Imazalil, Tebuconazole, Metalaxyl, and Imidacloprid. When opening this bag or loading/pouring the treated seed, wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves.

Treated Seed-Do Not Use for Food, Feed, or Oil Purposes.

Cover or collect spilled seeds.

Do not graze or feed livestock on treated areas for 45 days after planting.

Store away from feeds and foodstuffs.”

**NOTE:** Use with an EPA-approved dye that imparts an unnatural color to the treated seed.

**PRODUCT INFORMATION**

RAXIL MD EXTRA W is a combination of the insecticide, imidacloprid and the systemic fungicides, tebuconazole, metalaxyl and imazalil that aid in the control or suppression of the following seed, seedling and soilborne diseases of wheat, barley and triticale: stinking smut, flag smut, loose smut, early season *Septoria* disease complex, general seed rots, *Pythium* damping-off, early season *Rhizoctonia* root rot, early season common root rot, seedborne *Fusarium* scab, early season *Fusarium* foot rot, early season suppression of powdery mildew and rust. Imidacloprid offers suppression of wireworm activity on seed and young seedlings.

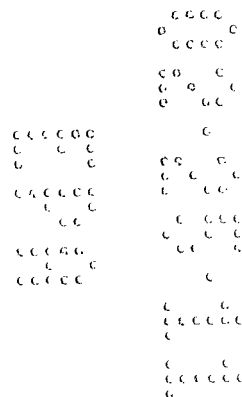
**APPLICATION DIRECTIONS**

**Wheat, Barley, Triticale:**

Use 5.14 fluid ounces of RAXIL MD EXTRA W per 100 pounds of seed. Applications should be made using standard slurry or mist-type seed treatment equipment. In some cases, a water and chemical slurry dilution may enhance coverage. A 1-part RAXIL MD EXTRA W with 1-part water dilution may be used. This product is for commercial or on farm application. Do not use for direct at plant applications into planter or hopper boxes. Uniform application to seed is necessary to ensure seed safety and best pest control. Seed should be sound and well cured prior to treatment. Consult your area agronomist regarding planting depth recommendations for the particular variety to be planted.

**ROTATIONAL CROPS:** Areas planted with with treated seeds may be replanted with wheat, barley, and triticale immediately. The following plant back intervals must be observed for listed crops.

ROTATIONAL PLANT-BACK INTERVALS*				
IMMEDIATE PLANT-BACK				30-DAY PLANT-BACK
Artichoke	Cranberry	Mustard seed	Sugar beet	Cereals (Including buckwheat, millet, oats, rice and rye) Safflower
Barley	Cucurbits	Okra	Tomatillo	
Brassica (cole) leafy veg.	Eggplant	Pepinos	Tomato	
Canola	Ground cherry	Pepper	Triticale	
Cilantro	Leaf petiole veg.	Popcorn	Turnip greens	
Corn, Field	Leafy veg.	Potato	Veg. Root and Tuber	
Corn, Sweet	Legume veg. (succulent or dried)	Rapeseed	Watercress	
Cotton		Sorghum	Wheat	
		Soybean		
		Strawberry		
<p>* Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.</p> <p>* All other crops not listed on this label, or for crops for which no tolerance for the active ingredient have been established, a 12-month plant-back interval should be observed.</p>				



**IMPORTANT: READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, disclaimer of Warranties and Limitations of Liability.

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 tests 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 Bayer CropScience, no claims are made to guarantee germination of carry-over seed.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. To the extent allowed by law, all such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

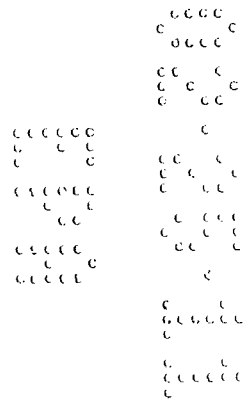
**LIMITATIONS OF LIABILITY:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF 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.

**NET CONTENTS:**

RAXIL is a registered trademark of Bayer



**PRODUCED FOR**



**Bayer CropScience**

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RAXIL MD EXTRA W Seed Treatment (PENDING) 02/22/2011