



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

264-1016

Date of Issuance:

SEP 24 2008

NOTICE OF PESTICIDE:

Registration  
 Reregistration  
(under FIFRA, as amended)

Terms of Issuance:

Conditional

Name of Pesticide Product:

Stiletto Pak

Name and Address of Registrant (include ZIP Code):

Attn: Jamin Huang  
Bayer Environmental Science  
2 T.W. Alexander Dr.  
Research Triangle Park, NC 27709

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

Based on your response to the Reregistration Eligibility Document(s) for **Carboxin, Metalaxyl and Thiram**, EPA has reregistered the product listed above provided that a final printed label is submitted to the Agency, within 30 days of the date hereon.

- Under the signal word "WARNING," on page 1, insert a space between "no entienda la..."
- In the first aid box revise the guidance entry, at the first bullet, under 'IF SWALLOWED', add "immediately," as "...or doctor immediately for treatment advice."

Signature of Approving Official:

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

Date:

SEP 24 2008

- 3. To the first sentence, in the 'PPE' section, on page 2, append "polyvinyl chloride or viton."
  - A. For "All mixers, loaders...must wear:" replace its four lines of guidance with "Coveralls worn over short-sleeved shirt and short pants, Chemical-resistant footwear plus socks, Chemical-resistant gloves, Chemical-resistant aprons when mixing, loading, cleaning up spills or cleaning equipment."
  - B. Revise the third statement, under this section, which refers to 'chemical resistant gloves,' by deleting: "except when...seeds," because it is inconsistent with the product's usage.
- 4. On page 2, in the 'Environmental Hazards' section, the first sentence must read:  
"This pesticide is toxic to fish, aquatic invertebrates, oysters and shrimp. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when cleaning equipment or disposing of equipment wash waters or rinsate."
- 5. Submit a separate label notification or amendment, which updates the container disposal statement to be compliant PR 2007-4.
- 6. Delete the 'Endangered Species' section, from page 2, because it is observed in the seed bag labeling section.
- 7. To the 'Agricultural Use Requirements' box, on page 3, in the final sentence, insert "shoes plus" to precede "socks and chemical resistant gloves...eyewear."
- 8. Replace 'Directions for Use of Stiletto Pak' heading, on page 3, with "General Information."
- 9. After the 'General Information' statement, on page 3, insert "All seed treated with this product and bagged, must be conspicuously colored at the time of treatment. If this product contains no colorant, an appropriate colorant must be added to distinguish seed and to prevent subsequent inadvertent use as a food for man or a feed for animals. Regulations pertaining to coloration of treated seed enforced by 40 CFR 153.155 must be strictly adhered to when using this product."
- 10. At the sixth bullet, under the 'Seed bag labeling' section, on page 3, add "metalaxyl" to the first sentence.
- 11. After deleting the text for the current 'Environmental Hazards' section, on page 2, insert the following: "*This pesticide is toxic to fish, aquatic invertebrates, oysters and shrimp. For terrestrial uses, do not apply to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when cleaning equipment or disposing of equipment wash waters or rinsate.*

*Treated seeds are hazardous to fish, birds, and mammals. Do not plant treated seed by broadcasting to the soil surface. Ensure that all seeds are thoroughly covered with soil, especially in turn areas. If seeds are not thoroughly incorporated by the planter during planting, additional incorporation may be required to thoroughly cover exposed seeds.*

*This product contains metalaxyl that is known to leach through soil into ground water under certain*

*conditions as a result of agricultural use. Use of this product in area where soils are permeable, particularly where the water table is shallow, may results in ground water contamination."*

12. Revise the 'Storage and Disposal' box, on page 2, by deleting '*PROHIBITIONS, Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment. Do not reuse empty container. Open dumping is prohibited*' then, add "*Do not contaminate water, food, or feed by storage and disposal.*"
  - A. To this section, append "*Pesticide*" to "*Storage,*" so that it reads "*Pesticide Storage.*"

Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. One copy of the label stamped "Accepted with comments" is enclosed for your records. If you have any questions regarding this correspondence, contact Bryant Crowe of my staff by phone at 703-305-0025 or via email at [crowe.bryant@epa.gov](mailto:crowe.bryant@epa.gov) or myself at 703-308-9443 or via email at [kish.tony@epa.gov](mailto:kish.tony@epa.gov).

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
SEP 24 2008

# STILETTO PAK

A MULTIPACK OF  
**VITAVAX® T-L Seed Protectant Fungicide**  
and  
**ALLEGIANCE™-FL Seed Treatment Fungicide**  
ONLY TO BE MIXED TOGETHER FOR USE ONLY ON SOYBEANS  
For sale to and use by professional applicators only. Not for sale to or use by homeowners/consumers.

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No. 264-1016

## VITAVAX T-L® Seed Protectant Fungicide

**ACTIVE INGREDIENTS:**

Carboxin (5,6-Dihydro-2-methyl-N-phenyl-1,4-oxathiazin-3-carboxamide).....	10.0%
Thiram (Tetramethylthiuramdisulfide).....	10.0%
<b>INERT INGREDIENTS:</b> .....	80.0%
<b>TOTAL:</b> .....	100.0%

## ALLEGIANCE®-FL Seed Treatment Fungicide

**ACTIVE INGREDIENT:**

Metalaxyl-N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alaninemethyl ester.....	28.35%
<b>INERT INGREDIENTS:</b> .....	71.65%
<b>TOTAL:</b> .....	100.00%

Contains 2.65 pounds Metalaxyl per gallon.

EPA Reg. No. 264- 1016.....EPA Est.

**KEEP OUT OF REACH OF CHILDREN  
WARNING AVISO**  
See Additional Precautionary Statements.

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.)

### FIRST AID

<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>Call a poison control center or doctor for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> </ul>
<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>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
<p><b>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.</b></p>	

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### WARNING AVISO

Causes skin irritation. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Do not get on skin or on clothing. Avoid contact with eyes. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### PERSONAL PROTECTIVE EQUIPMENT(PPE):

Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, and neoprene rubber ≥ 14 mils. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

All mixers, loaders, applicators and other handlers must wear:

- long-sleeved shirt and long pants
- socks plus shoes
- chemical resistant gloves, except when bagging or sewing bags of treated seeds,
- chemical resistant aprons when mixing, loading, or participating in dip treatments.

NOTE: Persons involved in bagging treated seed, sewing or moving bags of treated seed, or cleaning up bagging areas or seed treatment equipment are pesticide handlers and must wear the PPE required on this label for pesticide handlers.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, 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 clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

### ENGINEERING CONTROLS

When handlers use closed systems designed by the manufacturer to enclose the pesticide to prevent it from contacting handlers or other people and the system is functioning properly and is used and maintained in accordance with the manufacturer's written operating instructions, the handlers need not wear the chemical-resistant apron. However, the chemical-resistant gloves must be immediately available for use in an emergency, such as a spill or equipment breakdown.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate by disposal of wastes. Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.

Groundwater Advisory: This chemical 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.

Treated seeds are hazardous to fish, birds and mammals. Do not plant treated seeds by broadcasting to the soil surface. Ensure that all seeds are thoroughly covered with soil, especially in turn areas. If seeds are not thoroughly incorporated by the planter during planting, additional incorporation may be required to thoroughly cover exposed seeds.

### ENDANGERED SPECIES

This bag contains seed treated with carboxin and thiram. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult <http://www.epa.gov/espp> before each season's use of this product.

### 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.

**IMPORTANT:** Read the entire **Directions for Use** and the **Limited Warranty Statement** before using this product.

**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), 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 24 hours. Exception: Once the seeds are planted in soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no worker contact with the soil subsurface or treated seed. 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, or treated seed, is: coveralls, socks and chemical resistant gloves made of any waterproof material and protective eyewear.

**NOTE:** Seed treated commercially or for sale must be dyed an unnatural color using an EPA approved dye before being sold.

**LABELING OF TREATED SEED**

Seed that has been treated with this product that is then packaged or bagged for future use by growers or researchers must contain the following labeling on the outside of the seed package or bag.

- "This seed has been treated with metalaxyl, carboxin and thiram."
- "Treated Seeds. Do not use for Food, Feed or Oil Purposes."
- "Store away from feeds and foodstuffs."
- "This bag contains seeds treated with thiram. When opening this bag or loading/pouring the treated seed, wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves."
- "Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds. "Treated seeds are hazardous to fish, birds and mammals. Do not plant treated seeds by broadcasting to the soil surface. Ensure that all seeds are thoroughly covered with soil, especially in turn areas. If seeds are not thoroughly incorporated by the planter during planting, additional incorporation may be required to thoroughly cover exposed seeds. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate or by disposal of wastes."
- "This bag contains seed treated with carboxin and thiram. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult <http://www.epa.gov/espp> before each season's use of this product."
- "After the seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours. Exception: Once the seeds are planted in soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no worker contact with the soil subsurface or treated seed."

**DIRECTIONS FOR USE OF STILETTO PAK**

Vitavax T-L Seed Protectant Fungicide combines the systemic action of carboxin with the surface action of thiram to control various seed and seedling diseases. It is particularly effective against *Rhizoctonia solani* and shows good activity against various *Helminthosporium*, *Fusarium* and *Pythium* species. Allegiance-FL Seed Treatment fungicide provides control of *Pythium* rot and damping-off.

Stiletto Pak contains two 2.5 gallon containers of Vitavax T-L Seed Protectant Fungicide and two 1 pint containers of Allegiance-FL Seed Treatment fungicide. Stiletto Pak will treat 197 units (1 unit is a 50 pound bag) of soybean seed.

To apply: Add 1 pint of Allegiance-FL Seed Treatment Fungicide to each 2.5 gallon jug of Vitavax T-L Seed Protectant Fungicide. Shake well to mix the components together. Apply to soybean seed at a rate of 6.8 fl. ounces per hundredweight of seed (equivalent to 3.4 fluid ounces per 50 pounds of seed). Apply as a hopperbox application or through on-farm seed treatment equipment. Apply the proper amount of Stiletto Pak evenly over the surface of the seed. Mix until a uniform color is imparted to all seed.

**STORAGE AND DISPOSAL**

**PROHIBITIONS**-Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited. Do not reuse empty containers.

**STORAGE**-Store in a cool dry location. Do not store in direct hot sunlight. Do not store above 90°F for prolonged periods of time. After prolonged storage in intense cold, allow product to return to approximately 75°F before using.

**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**-Triple rinse (or equivalent). Then offer for recycling or reconditioning, 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.

**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 LP 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 LP. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE LP MAKES NO OTHER 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 LP 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 LP 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 LP'S ELECTION, THE REPLACEMENT OF PRODUCT.

ALLEGIANCE is a registered trademark of Bayer.  
VITAVAX is a registered trademark of Chemtura, Inc.

Produced for



**Bayer CropScience**

**Bayer CropScience LP**  
**P.O. Box 12014, 2 T.W. Alexander Drive**  
**Research Triangle Park, North Carolina 27709**  
**1-866-99BAYER (1-866-992-2937)**

STILLETTO PAK (PENDING) SUBMITTED TO EPA 09/24/07, RESUBMITTED 01/31/08 FOR THIRAM DCI.