

400-135

02/17/2000

1/5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

FEB 17 2000

Mr. Willard F. Cummings
Uniroyal Chemical Company, Inc.
74 Amity Road
Bethany, Connecticut 06524-3402

Subject: Royaltac®
EPA Registration No. 400-135
Your label amendment application dated December 27,
1999

Dear Mr. Cummings,

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

In the first paragraph of the "PERSONAL PROTECTIVE EQUIPMENT" section and the last paragraph of the "AGRICULTURAL USE REQUIREMENTS" section, the requirement for use of "waterproof gloves" must be changed to use of "chemical resistant gloves (Category A)". This was discussed with the Agency expert on the Worker Protection Standard, who informed us that the use of "waterproof gloves" has proven to be unenforceable (thin latex hospital gloves, for example, are waterproof but are not acceptable as Personal Protective Equipment), leading to the policy to use the second term above.

A copy of the label stamped "ACCEPTED with COMMENTS" is enclosed for your records. You must submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration may be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,



Cynthia L. Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

) Attachment: Label stamped "ACCEPTED with COMMENTS" -

3/5

ROYALTAC®

ACCEPTED
with COMMENTS
In EPA Letter Dated:

FEB 17 2000

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

CONTACT TOBACCO SUCKER CONTROL AGENT

400-135

Net contents:

COMPOSITION

Active Ingredient: (% by weight)	
n-decanol	78.4%*
Inert Ingredients:	21.6%
Total:	100.0%

*Contains 5.7 pounds of active ingredient per gallon.

*Contains 684 grams of active ingredient per liter.

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.)

FIRST AID

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if symptoms persist.

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and Other Handlers Must Wear: long-sleeved shirt and long pants; waterproof gloves; shoes plus socks; protective eyewear.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-5)], 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.

**UNIROYAL
CHEMICAL**

ENVIRONMENTAL HAZARDS

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 by disposal of equipment washwaters.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all label directions carefully before use.

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

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

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) 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.

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; protective eyewear

FOR USE ON TOBACCO

ROYALTAC® is a contact tobacco sucker control agent. Direct contact of this product with the suckers is essential for effective control. The spray should wet the sides of the tobacco stalk and contact all small immature suckers.

ROYALTAC may be used for contact control of sucker growth on all types of tobacco.

See APPLICATION NOTES for additional important information.

APPLICATION EQUIPMENT

When applied with power spray equipment, use three nozzles per row. One nozzle should be directed downward over the center of the row and the others should be about 9 inches on either side, directed at or slightly above the top of the stalk. The diluted ROYALTAC should be applied as a coarse spray from a height of 12 to 16 inches above the top leaves. For best results, the boom pressure should be kept at 20 to 25 pounds per square inch (psi) and should never exceed 30 psi.

When a power sprayer is used, be sure the solution is thoroughly mixed before application begins, and maintain agitation during application.

If a hand-held or backpack sprayer is used, the product should be applied at a rate of 2/3 to one ounce of spray solution per plant (or enough to assure run down to the bottom of the plant). A coarse spray is recommended, directed downward at the top of the stalk from 6 to 8 inches above the top leaves. Only low tank pressure is required, and in no case should more than 20 psi be used. Be sure the solution is thoroughly mixed before application begins, and maintain agitation during application.

All sprayers should be equipped with a pressure regulator and pressure gauge.

TIMING OF APPLICATION

ROYALTAC can be applied either before or after topping, preferably just after buttons have elongated and before flowers start to open. At this stage, few suckers are large enough to require removal by hand.

Best results are usually obtained by application of ROYALTAC as directed, and then topping within a week.

If tobacco is topped first, apply ROYALTAC within two days after topping. Any suckers longer than one inch should be removed while topping.

RATE OF APPLICATION

Flue-Cured Tobacco

Mix 1.5 gallon of ROYALTAC in 50 gallons of water. Apply 50 gallons of the diluted mixture per acre. If sucker growth is vigorous or if the development of the tobacco in the field is irregular, second and third applications of ROYALTAC, at 3 to 5 day intervals, may be needed. For these additional applications, use 1.5 gallon of this product per acre in 50 gallons of water.

Seven to 10 days after the last ROYALTAC application, apply ROYAL MH-30® (or other maleic hydrazide systemic sucker control agent) at the labeled rate and timing.

Air-Cured (burley, Maryland or cigar) Tobacco

Mix 2.0 gallons of ROYALTAC in 50 gallons of water. Apply 40 to 60 gallons of diluted mixture per acre. For hand sprayers, mix 5 fluid ounces of this product per gallon spray solution. When applied by hand, one gallon of diluted solution will treat 130 to 190 plants.

Dark Tobacco

Mix 2.75 gallons of ROYALTAC in 50 gallons of water. Apply 40 to 60 gallons of diluted mixture per acre. For hand sprayers, mix 7 fluid ounces of this product per gallon spray solution. When applied by hand, one gallon of diluted solution will treat 130 to 190 plants.

SEQUENTIAL TREATMENT PROGRAMS

Air-Cured (burley, Maryland, or cigar) and Dark Tobacco

ROYALTAC application may be followed in 7 to 10 days by ROYAL MH-30 (or other maleic hydrazide systemic sucker control agent) at the labeled rate. If a systemic material is not used, a second ROYALTAC application may be made 5 to 7 days after the first ROYALTAC application.

TANK MIX APPLICATIONS

Flue-Cured Tobacco

A tank mixture of ROYALTAC and ROYAL MH-30 (or other maleic hydrazide systemic sucker control agent) may be applied to flue-cured tobacco at the early flower growth stage. This tank mix usually follows application of a contact sucker control agent. The tobacco should be topped, and all suckers over one inch long removed, before treatment.

Mix 1.5 gallon of ROYALTAC with 1.5 gallon of ROYAL MH-30 (or other maleic hydrazide product at equivalent labeled rate) in 50 gallons of water for each acre to be treated. Maintain good agitation after mixing and while spraying.

The tank-mixture is applied with motorized field sprayers (high clearance or tractor-mounted) equipped with solid-cone nozzles that deliver a coarse spray over the row.

NOTE: Use only one application of this tank mix per season. Tobacco should not be harvested earlier than 7 days after application of this tank mix. Before using this mixture, read and observe label precautions appearing on the ROYALTAC and the maleic hydrazide product labels.

APPLICATION NOTES

1. Application of ROYALTAC at concentrations higher than recommended may cause leaf damage.
2. Be sure spray equipment is clean prior to use.
3. After adding ROYALTAC to the spray tank, start up and maintain good agitation of the diluted solution.
4. Do not mix ROYALTAC with other tobacco chemicals, except as specified in this label (see TANK MIX APPLICATIONS).
5. Do not apply this product to wet plants, such as immediately after heavy rain or when there is a heavy dew.
6. Do not apply on windy days, since the spray solution may not be deposited uniformly on the leaf axils and sucker buds.
7. Do not spray during the middle of the day in very hot weather, since leaf burn may occur. Injury may also result if the product is sprayed on the underside of the tobacco leaf, such as when the wind is strong enough to turn over the top leaves.

STORAGE AND DISPOSAL

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

STORAGE: Store in original container only. After partial use, replace lid and close tightly. Store in a secure place that is temperate and dry.

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

EQUIPMENT CLEANING: This product is not corrosive to spray equipment. Following applications, all spray equipment should be thoroughly rinsed with water. Do not contaminate water by disposal of equipment washwaters.

CONTAINER DISPOSAL:

Plastic Containers: Triple rinse (or equivalent). Pressure rinse is preferred. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

EMERGENCY ASSISTANCE:

UNIROYAL CHEMICAL EMERGENCY PHONE	203-723-3670
SAFETY DATA AND INFORMATION	203-573-3303
TRANSPORTATION EMERGENCY (CHEMTREC)	800-424-9300

IMPORTANT NOTICE - Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use for this product, contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

©ROYALTAC and ©MH-30 are Registered Trademarks of Uniroyal Chemical Company, Inc.
©Copyright 1999, Uniroyal Chemical Company, Inc.