UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 3 0 2001

Mr. Allen R. Blem Uniroyal Chemical Company, Inc. 74 Amity Rd. Bethany, CT 06524-3402

Subject: Royaltac

EPA Reg. No. 400-135

Your February 16, 2001 application for amendment

Dear Mr. Blem,

The application above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is accepted with comment provided you make the following revision.

In the precautionary statements, under PPE, add the statements "Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart". Revise the statement to read "Applicators and other handlers must wear long-sleeved ..., chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride, shoes plus ... eyewear".

CONCURRENCES							
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The other proposed label revisions are acceptable. Please make the changes required above and resubmit one copy of the final printed label prior to distribution of this label into channels of trade. A copy of the stamped accepted with comment label is enclosed for your files. If there are questions concerning this matter, contact Dr. Tom Ellwanger at (703) 308-9352.

Sincerely,

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

Enclosure



ROYALTAC®

Net contents:

CONTACT TOBACCO SUCKER CONTROL AGENT

AUG 3 0 2001

Under the Federal Insecticide, Fundicide, and Rodenticide Act as smended, for the pesticide

n-decanol registered under EPA Reg. No. 78.4%*
Inert Ingredients: 400 - (35 21.6%

Inert Ingredients: *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

Active Ingredient: (% by weight)

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

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lens, if present, after the first 5 minutes, then continue rinsing
- Call a poison control center or doctor for treatment advice.

- IF SWALLOWED: Call poison control center or doctor immediately for treatment advice.
 - · Have person sip a glass of water if able to swallow.
 - Do not induce vomiting unless told to do so by the poison control center or doctor.
 - Do not give anything by mouth to an unconscious person.

IF ON SKIN OR

CLOTHING

- · Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- · Call a poison control center or doctor for treatment advice.

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

EMERGENCY ASSISTANCE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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

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. Wash thoroughly with soap and water after handling. 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; chemical resistant gloves (Category A); 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 dispesticide gets inside. Then wash thoroughly and put on clean clothing.

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 at 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; chemical resistant gloves (Category A); 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 $\frac{2}{3}$ 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

- 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.
- 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.

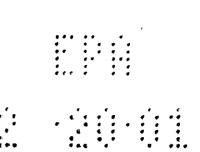
CONTAINER DISPOSAL:

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.

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.

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