



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

FEB 10 2003

Mr. Willard F. Cummings
Crompton Corp.
74 Amity Road
Bethany, CT 06524-3402

Subject: Amendment Updating First Aid in Accordance with PR Notice 2001-1
Terraclor® 10% Granular
EPA Reg. No. 400-402
Your Submission Dated November 26, 2002

Dear Mr. Cummings:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments below.

1. The statement on the front panel below the First Aid section indicates that the Precautionary Statements and Directions for Use are contained in an attached booklet. The Precautionary statements (including First Aid, Hazards to Humans and Domestic Animals, Personal Protective Equipment and Environmental Hazards) must appear on the container label itself. They may also appear in the accompanying booklet; however, they must be readily visible on the container label. The Directions for Use need not appear on the immediate container label. They may be included in a supplemental booklet, provided the booklet is securely attached to the container. As defined in the regulations at 40 CFR §156.10(a)(4), "securely attached" means that a label can reasonably be expected to remain affixed during the foreseeable conditions and period of use.

In addition, in accordance with PR Notice 93-7, if the Agricultural Use Requirements box is placed on supplemental labeling in the Directions for Use, the following brief Agricultural Use Requirements box must be placed on the container label "near the statement referring users to the supplemental labeling":

Agricultural Use Requirements
Use this product only in accordance with its labeling and with the Worker Protections Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Accordingly, if you wish to include the Directions for Use in a supplemental booklet, you must include these statements on the container label itself.

2. Delete the asterisk after "Inert Ingredients" in the ingredient statement, since there is no corresponding footnote.
3. Under Personal Protective Equipment and in the list of PPE required for early re-entry, change "waterproof gloves" to "chemical-resistant gloves made of any waterproof material."

A stamped copy of the label is enclosed for your records. Two copies of the finished labeling must be submitted prior to releasing the product for shipment.

Sincerely,



Mary L. Waller
Product Manager 21
Fungicide Branch
Registration Division (7505C)

Enclosure

ACCEPTED
with COMMENTS
In EPA Letter Dated:
FEB 10 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No. 400-402

Terraclor® 10% GRANULAR

Soil Fungicide

Net
Contents:

COMPOSITION

Active Ingredient: (% by weight)	
Pentachloronitrobenzene (PCNB)	10%
Inert Ingredients:*	90%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

- | | |
|----------------------------------|--|
| IF IN EYES: | <ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice. |
| IF ON SKIN OR ON CLOTHING | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor treatment advice. |
| IF SWALLOWED: | <ul style="list-style-type: none"> • 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 INHALED: | <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice. |

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

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

Precautionary Statements and Directions for Use are in the attached booklet. If booklet is missing, contact Crompton or an authorized dealer.

EPA REG. NO. 400-402
EPA EST. NO.
013CM

Crompton Manufacturing Company, Inc.
Middlebury, CT 06749

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Avoid inhaling dust. This material may cause skin irritation.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and Other Handlers (other than mixers and loaders) Must Wear: A long-sleeved shirt & long pants; and shoes plus socks.
Mixers and Loaders Must Wear: A long-sleeved shirt & long pants; waterproof gloves and shoes plus socks.
 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.

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

This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Cover, collect or incorporate spilled granules. Do not contaminate water when disposing of equipment washwaters.

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, 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 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 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 12 hours.

Exception: if the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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 and socks.

When a rate range is shown the lower rate should be used on lighter soils or when disease pressure is expected to be low. The higher rates should be used on heavy soils, in fields with a history of disease problems, or when weather conditions are expected to be unfavorable for rapid germination and growth of seedlings.

CROP	DISEASE	RATE OF TERRACLOR 10% GRANULAR		RECOMMENDED APPLICATION
		POUNDS/ACRE	POUNDS/1000 FEET OF ROW	
Cotton	Damping-off, Seed and Seedling Rots (<i>Rhizoctonia solani</i>)	8 to 15 (40 inch row spacings)	0.6 to 1.1	In-Furrow Application: Apply the specified dosage to the soil around the seed and to the covering soil as it fills in the furrow. The soil around the seed and the covering soil should be thoroughly mixed with the product. The higher rates should be used when weather conditions are expected to be unfavorable for rapid germination, fields have a history of disease problems or minimum or low till programs are utilized.
		In California: 10 to 20 (40 inch row spacings)	0.75 to 1.5	
Apply only at planting time. Do not exceed 2 lbs. of PCNB active ingredient per acre in any one season applied as spray or granular formulations. Do not allow feeding or grazing of cotton foliage by livestock.				

Beans (excluding cowpeas)	Root and Stem Rot (<i>Rhizoctonia solani</i>)	10 to 15 (36 inch row spacing)	0.75 to 1	In-furrow Application: Direct the material into the planting furrow and covering soil at planting time.
Apply only at planting time. Do not feed treated vines or hay to livestock.				

CROP	DISEASE	RATE OF TERRACLOR 10% GRANULAR		RECOMMENDED APPLICATION
		POUNDS/ACRE	POUNDS/1000 FEET OF ROW	
Broccoli, Chinese broccoli (gai lan, white flowering broccoli), Brussels sprouts, Cabbage, Chinese cabbage (tight-heading varieties only), Cauliflower, Collards*, Kale*, Mustard greens*	Clubroot (<i>Plasmodiophora brassicae</i>)	200 (40 inch row spacing)	15	Row Application: Apply in a 12 to 15 inch band, by means of a suitable applicator, and rototill to a depth of 4 to 6 inches, immediately prior to planting. May be used on cole crops which are direct seeded.
		- OR -		
		300	-	Broadcast Application: Apply to the soil surface prior to planting. Disc and cross disc to a depth of 4 to 6 inches. May be used on cole crops which are direct seeded.
For control of clubroot, it is very important to thoroughly mix TERRACLOR with the soil.				
- OR -				
	Wire Stem or Black Root (<i>Rhizoctonia solani</i>)	110 to 150 (40 inch row spacing)	8.5 to 11.5	Row Application: Apply in an 8 inch band centered on the row, immediately prior to seeding.
*Based on the available residue data, the use of Terraclor on collards, kale and mustard greens is restricted to the state of Georgia. Apply only at planting time. Do not exceed 30 lbs. of PCNB active ingredient per acre in any one season regardless of the method of application or formulation used.				

Hot Peppers (direct seeded)	Root and Stem Rot (<i>Rhizoctonia solani</i>)	10 to 13	0.75 to 1.0	In-furrow Application: Apply only at planting time. Apply to the soil around the seed and to the covering soil as it fills the furrow.
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Peanuts	Root and Stem Rot (<i>Rhizoctonia solani</i>)*	10-20 (36 inch row spacing)	0.7 to 1.4	In-furrow Application: Apply in furrow at planting using suitable equipment.
Do not exceed 2 lbs. of PCNB active ingredient per acre in any one season regardless of the method of application or formulation used. Apply only at planting time. Do not feed treated vines to livestock. Do not allow hogging down of peanuts. *Use not registered by the California Department of Pesticide Regulation.				

Rotation Restriction: Do not plant root crops in PCNB treated fields within 12 months of broadcast and banding applications unless PCNB is registered for use on those crops.

CROP	DISEASE	APPLICATION NOTES
Vegetable Bedding Plants: Beans (excluding cowpeas) Broccoli Brussel sprouts Cabbage Cauliflower Peppers Tomatoes	Root and Stem Rot, Damping-off (<i>Rhizoctonia solani</i>) (<i>Pellicularia filamentosa</i>)	GROWING MEDIA MIX: Mix 1 to 1.5 lbs. per cubic yard of media. Ingredients should be free of large lumps and dry enough to prevent agglomeration. Blend thoroughly to insure uniform distribution throughout the mixture. Use the lower rate for mixtures used at time of seeding or transplanting of young seedlings or plugs. Use the higher rate for older plants.

STORAGE AND DISPOSAL

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

STORAGE - Store in a dry location.

PESTICIDE DISPOSAL - Pesticide 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 - 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.

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, expressed or implied, extends to the use of 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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