

File



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

JAN 14 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Willard F. Cummings  
UNIROYAL CHEMICAL CO. INC.  
74 AMITY ROAD  
BETHANY, CT 06524

Subject: Label Amendment Submission of 07/16/93 in Response to PR Notice 93-7  
EPA Reg. No.400-405  
TERRACLOR SUPER 2E

**IMPORTANT NOTICE:** This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**SERIOUS ERROR(S) ON SUBMITTED LABELING:**

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

**YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING.** Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

**YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.**

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Recycled/Recyclable  
Printed with Soy/Carna Ink on paper that  
contains at least 50% recycled fiber

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director  
Compliance Division, (7203)  
Worker Protection Notification  
Office of Compliance Monitoring  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD **CONTACT IMMEDIATELY** THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling as amended

**AND**

- WITHIN one year from date of this acceptance.

Submit the final printed labeling via the U.S. Postal Service to:

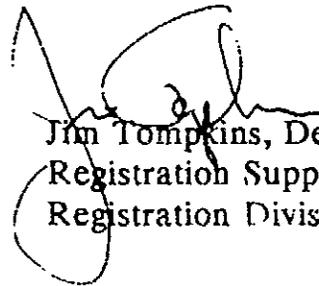
Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

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Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

# Proposed WPS Labeling

(5 copies, 2 of them highlighting all statements added to achieve compliance)

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043

# TERRACLOR Super X<sup>®</sup>

## EMULSIFIABLE

### SOIL FUNGICIDE

#### Controls Rhizoctonia, Pythium and Fusarium Soil-Borne Seedling Diseases of Cotton

Terraclor Super X contains two active ingredients, Terraclor<sup>®</sup> and Terrazole<sup>®</sup>

### UNIROYAL CHEMICAL

#### COMPOSITION

Active Ingredient: (% by weight)	
Pentachloronitrobenzene (PCNB) .....	23.2%
5-Ethoxy-3-(trichloromethyl)-1,2,4-thiadiazole .....	5.8%
Inert Ingredients: .....	71.0%
<b>TOTAL .....</b>	<b>100.0%</b>

Contains 2 lbs. of Pentachloronitrobenzene and  
0.5 lbs. of 5-Ethoxy-3-trichloromethyl-1,2,4-thiadiazole per U.S. gallon.  
UNIROYAL CHEMICAL COMPANY, INC., Middlebury, Connecticut 06749 005WPS  
EPA REG. NO. 400-405  
EPA EST. NO.

Net Contents:

## KEEP OUT OF REACH OF CHILDREN WARNING AVISO

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.)

#### STATEMENT OF PRACTICAL TREATMENT

- IF IN EYES: Flush eyes with plenty of water. Get medical attention.
- IF ON SKIN: Wash with plenty of soap and water. Get medical attention.
- IF SWALLOWED: Call a physician or Poison Control Center. Drink an eight ounce glass of water containing 2 tablespoons of activated charcoal.

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS

##### WARNING

Harmful if swallowed. Do not inhale spray mist. Do not get on skin or in eyes. May cause skin irritation. Skin contact may be harmful. Wash thoroughly all exposed skin. In case of eye contact, flush with plenty of water.

#### PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category G on an EPA chemical resistance category selection chart.

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

**Mixers and Loaders Must Wear:** A long-sleeved shirt & long pants; waterproof gloves; shoes plus socks; protective eyewear. For exposures in enclosed areas: A respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G). For exposure outdoors: Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

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.

#### 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. Drift and runoff from treated areas may be hazardous to fish and aquatic organisms in adjacent aquatic sites. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean highwater mark. Do not contaminate water when disposing of equipment washwaters.

#### PHYSICAL OR CHEMICAL HAZARDS

Flammable. Do not use or store near heat sources or open flame. Do not use in the vicinity of pilot lights.

Engineering Control Statements:  
When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

JAN 14 1994

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

400-405

## 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 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 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 plus socks
- protective eyewear

### COTTON

(Seedling Disease Complex - Rhizoctonia, Pythium and Fusarium)

**SOIL IN-FURROW APPLICATION:** At planting time, use 3 to 6 pints per acre (per 13,000 linear feet based on 40 in. rows) mixed with 5 to 15 gallons of water. Apply the specified dosage to the soil around the seed and to the covering soil as it fills the furrow. The soil around the seed and the covering soil should be thoroughly mixed with the product. Two nozzles work best; center the front nozzle over the open furrow to spray the soil around the seed and the rear nozzle to spray the covering soil as it fills the furrow.

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.

Do not allow the feeding or grazing of cotton foliage by livestock.

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.

**ROTATION RESTRICTION:** Do not plant root crops in PCNB treated fields within 12 months of application unless PCNB is registered for use on those crops.

## STORAGE AND DISPOSAL

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

**STORAGE - Protect from temperatures below 20°F.**

**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 -** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by State and local authorities.

**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 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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