

400-405

04/10/2007

114



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Willard F. Cummings
U.S. Registration Manager
Chemtura USA Corporation
Middlebury, CT 06749

APR 10 2007

Subject: Terraclor SuperX[®] Emulsifiable
EPA Reg. No. 400-405
Your 90 day response to etridiazole DCI dated July 28, 2006
EPA Decision Number 321773

Dear Mr. Cummings:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. Use the complete mailing address of Crompton Corporation on the first page of the label.
2. In the IMPORTANT NOTICE, delete the words "or under abnormal conditions"
3. In the IMPORTANT NOTICE, change "...foreseeable to seller, and buyer assumes the risk of any such use." to "...foreseeable to seller and, to the extent consistent with applicable law, the buyer assume the risk of any such use."

One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

EPA determined that you fulfilled the requirements of the etridiazole RED for the subject product. However, we are unable to reregister the product under FIFRA 4(g)(2)(c) at this time since it also contains the active ingredient PCNB for which a reregistration eligibility decision was issued July 2006. This product will be reregistered once the data requirements have been satisfied for this product under the PCNB RED.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mary L. Waller".

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

Enclosure

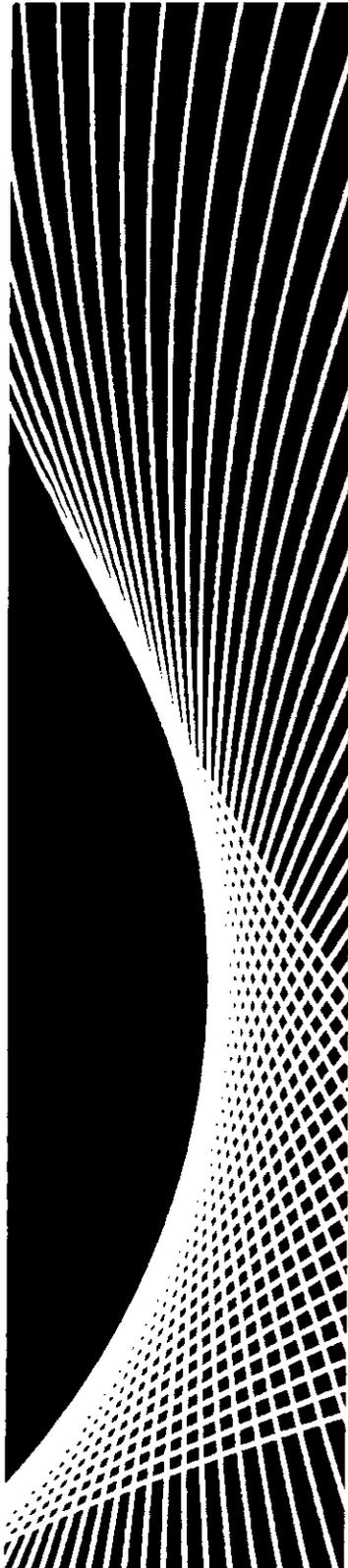
ACCEPTED
with COMMENTS
In EPA Letter Dated

2/4

APR 10 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No. 400-405

TERRACLOR SUPER X EMULSIFIABLE



SOIL FUNGICIDE

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

Terraclor Super X contains two active ingredients, Terraclor® and Terrazole®

Net
contents:

Active Ingredients: (% by weight)

| | |
|---|--------|
| PCNB: Pentachloronitrobenzene | 23.2% |
| Etriazole: 5-Ethoxy-3-(trichloromethyl)-1,2,4-thiadiazole | 5.8% |
| Other Ingredients*: | 71.0% |
| TOTAL | 100.0% |

*Contains petroleum distillates.

Contains 2 lbs. of Pentachloronitrobenzene and
0.5 lbs. of 5-Ethoxy-3-trichloromethyl-1,2,4-thiadiazole per U.S. gallon.

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 | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, 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 for treatment advice. |
| IF SWALLOWED | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give any liquid to the person. • 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 by 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.

| | |
|--|--------------|
| EMERGENCY PHONE | 800-292-5898 |
| SAFETY DATA AND INFORMATION | 203-573-3303 |
| TRANSPORTATION EMERGENCY (CHEMTREC) | 800-424-9300 |

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Contains petroleum distillate - vomiting may cause aspiration pneumonia.

EPA REG. NO. 400-405
EPA EST. NO.
011

Chemtura USA Corporation
Middlebury, CT 06749



www.chemtura.com

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

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Harmful if 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

Some materials that are chemical-resistant to this product are made of barrier laminate or viton. If you want more options, follow the instructions for Category G on an EPA chemical resistance category selection chart.

All mixer, loaders, applicators and other handlers must wear: Long-sleeved shirt and long pants; chemical-resistant gloves; NIOSH approved respirator (except for applicators applying in-furrow to cotton) with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an OV cartridge or canister with and N², R, P or HE prefilter; shoes plus socks; goggles or faceshield.

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 exist, 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)(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/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into 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 water is present or to intertidal areas below the mean highwater mark. Do not contaminate water when cleaning equipment or when disposing of equipment washwaters.

Surface Water Advisory: Etridiazole can contaminate surface water through spray drift. Under some conditions, etridiazole may have a high potential for runoff into surface water for several weeks postapplication. These conditions include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow groundwater, areas with infield canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas overlaying tile drainage systems that drain surface water.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

This product contains xylene. Check manufacturer's recommendations for hoses, seals and fittings that are compatible with xylene.

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.

Do not allow product to drift.

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.

Note: after the expiration of the REI whenever Terrazole-treated soil or planting media is being handled or disturbed indoors, continuous ventilation of the area is required at a minimum rate of one complete air exchange per hour.

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
- chemical-resistant gloves, such as barrier laminate or viton
- shoes plus socks
- protective eyewear

TANK MIXTURE COMPATIBILITY

Combinations of **Terraclor Super X Emulsifiable** with fungicides, insecticides, plant growth regulators or fertilizers should be checked for compatibility before tank mixing. Use a jar test to mix the recommended proportions of each product in a volume of water which is proportionate to the expected field use rate. The mix is considered compatible if it remains stable or can be easily reconstituted by shaking after standing for 5 minutes.

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.

PESTICIDE STORAGE - Store the product in a cool and dry place. Protect from temperatures below 20°F. Do not store near heat sources or open flame.

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, 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.

TERRACLOR®, TERRAZOLE® and TERRACLOR Super X® are Registered Trademarks of Chemtura Corporation
©Copyright 2006, Chemtura