



PM 21 400-411 11/29/96 Labeling
Acceptance Stamp on Pg. 5 Page 1 of 7

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

NOV 29 1996

Willard F. Cummings
UNIROYAL CHEMICAL CO. INC.
74 Amity Rd
Bethany, CT 06524

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 06/28/93 in Response to PR Notice 93-7
EPA Reg. No. 400-411
TERRACLOR 65% PLUS DI-SYSTON 6.5% GRANULAR

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.

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

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RESTRICTED USE PESTICIDE
Due to Acute Human Oral, Dermal, and Inhalation Toxicity.
For retail sale to and use only by certified applicators, or
persons under their direct supervision, and only for those uses covered by the
certified applicator's certification.

TERRACLOR® 6.5%

PLUS
Di-Syston® 6.5%

GRANULAR

SOIL FUNGICIDE — SYSTEMIC ORGANOPHOSPHATE INSECTICIDE



ACCEPTED
with COMMENTS
In EPA Letter Dated

NOV 29 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
400-411

COMPOSITION

Active Ingredients: (% by weight)	
Pentachloronitrobenzene (PCNB)	6.5%
Disulfoton: O,O-Diethyl S-[2-(ethylthio) ethyl] phosphorodithioate*	6.5%
Inert Ingredients	87.0%
Total:	100.0%

*U.S. Patent No. 2,759,010.

UNIROYAL CHEMICAL COMPANY, INC., Middlebury, CT 06749
EPA REG. NO. 400-411
EPA EST. NO.

005WPS

NET WEIGHT

KEEP OUT OF REACH OF CHILDREN
POISON
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 this label, find someone to explain it to you in detail.)

POISONOUS IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN.
RAPIDLY ABSORBED THROUGH SKIN. THIS PRODUCT CONTAINS AN ORGANOPHOSPHATE INSECTICIDE.
REPEATED INHALATION OR SKIN CONTACT MAY, WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE SUSCEPTIBILITY TO DISULFOTON POISONING.
ATROPINE AND 2-PAM ARE ANTIDOTES FOR DI-SYSTON. CALL A PHYSICIAN IMMEDIATELY
IN ALL CASES OF SUSPECTED POISONING

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.
IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.
IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.
IF IN EYES: Flush with plenty of water. Call a physician immediately.
NOTE TO PHYSICIAN: Warning symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pinpoint pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps.
ANTIDOTE: Administer atropine sulfate in large therapeutic doses. Repeat as necessary to the point of tolerance. 2-PAM is also antidotal and may be administered in conjunction with atropine. Compound inhibits cholinesterase resulting in stimulation of the central nervous system, the parasympathetic nervous system, and the somatic motor nerves. Do not give morphine. Watch for pulmonary edema, which may develop in serious cases of poisoning even after 12 hours. At first sign of pulmonary edema, the patient should be placed in an oxygen tent and treated symptomatically. Repeated exposure to cholinesterase inhibitors may, without warning, cause increasing susceptibility to very small doses of any cholinesterase inhibitor. Allow no further exposure until cholinesterase regeneration has taken place as determined by blood tests.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
DANGER**

Poisonous if swallowed, inhaled, or absorbed through the skin. Rapidly absorbed through the skin. Do Not Breathe Dust. Do Not Get in Eyes, On Skin, Or Clothing.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and Other Handlers Must Wear: Long-sleeved shirt and long pants; waterproof gloves; shoes plus socks; protective eyewear; chemical-resistant headgear for overhead exposure. 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 exposures 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.

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)(4-6)], the handler PPE requirements may be reduced or modified as specified by 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.
- 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, aquatic organisms and wildlife. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and run-off from treated areas may be hazardous to fish in neighboring areas. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spills. This pesticide is toxic to bees exposed to direct application. Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.

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) notification to workers, 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 48 hours. The REI is 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

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
- Chemical-resistant headgear for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

COTTON

For control of damping-off (*Rhizoctonia solani*) and early season control of thrips, aphids and mites, apply at planting time as a soil in-furrow application, near seeds and over covering soil while using a suitable applicator properly calibrated to assure accurate placement and proper dosage levels.

The higher use rate should be used under the following conditions:

1. fields have a heavy disease inoculum history
2. soils are cold or wet
3. no or low till programs are utilized

Application Method	Rate of Formulation	
	Lbs./drill row per acre	Lbs./1300 linear feet of row based on 40 inch spacing
DRILL PLANTING	12 to 15	1.2 to 1.5
	In California:	
	15	1.5
HILL-DROP PLANTING	4 to 5	0.4 to 0.5
	In California:	
	5	0.5

Soil temperature, moisture and tilth should be favorable for good germination and emergence. Systemic insecticides, however, can possibly damage seed germination or stunting of seedlings under adverse conditions such as extremely cool or wet, or extremely dry weather. Such damage may be more pronounced in light, sandy soils or when used in conjunction with certain pre-emergence herbicides.

USE PRECAUTIONS

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 plant root crops in PCNB treated fields within 12 months of broadcast and banding applications unless PCNB is registered for use on those crops.

Do not feed treated forage to livestock.

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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 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 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, 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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® **DI-SYSTON** is a Registered Trademark of Bayer AG, Germany

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