SEP 17 2001

Ms. Betsv Katzman Uniroyal Chemical Co., Inc 74 Amity Rd. Bethany, CT 06524-3402

Dear Ms. Katzman:

Subject: Terrazole 35% Wettable Powder EPA Reg. No. 400-416 Your Submission of April 19, 2001

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The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that the following labeling changes are made prior to release of the product for shipment.

- 1. Since the label contains uses which are not subject to WPS, a Non-Agricultural Use Requirements box must be added which contains the statement "Do not enter or allow others to enter until sprays have dried."
- 2. The third line under Directions for Use prohibits application through any type of irrigation system but the label includes instructions for chemigation. Delete the prohibition or the directions for chemigation to resolve this conflict.
- 3. For turf, include the statement "For commercial use only. Not for use on home lawns, sod farms or municipal parks."
- 4. Note that there is a typographical error under Application Notes for turf in the maximum application rate per application. Change "ar" to "ai" or preferably, to "active ingredient".
- 5. There is an error in the first sentence of the directions for use on tobacco. The rate is indicated as "fl.oz.". Since this is a wettable powder, "fl.oz." must be changed to "oz.".
- 6. Revise the Storage and Disposal section by adding a heading for Storage and include appropriate information.

Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed.

Sincerely yours,

Mary L. Waller

Product Manager (21)

Fungicide Branch

Registration Division (7505C)

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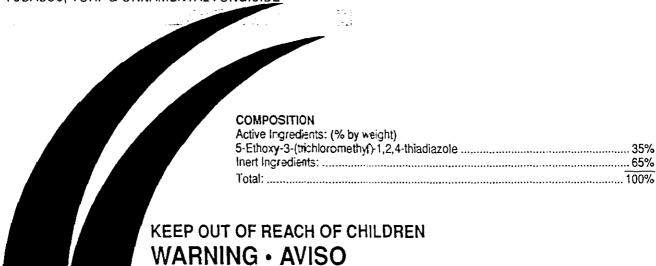
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Enclosure

7505C:CGrable:cg:9/14/01

# Terrazole®

35% WETTABLE POWDER
TOBACCO, TURF & ORNAMENTAL FUNGICIDE



Net contents:

Si usted no entiende to etiqueto, 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 SWALLOWED · Call a poison control center or doctor immediately for treatment advice. · Have person sip a glass of water if able to swallow. Do not induce vamiting unless told to do so by the poison control center or doctor. . Do not give anything by mouth to an unconscious person. IF IN EYES 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 · Call a poison control center or doctor for treatment advice. IF ON SKIN OR . Take off contaminated clothing. ON CLOTHING · Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice. IF INHALED . 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 ceater 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. UNIROYAL CHEMICAL EMERGENCY PHONE 203-723-3670 SAFETY DATA AND INFORMATION 203-573-3303 TRANSPORTATION EMERGENCY (CHEMTREC) 800-424-9300

UNIROYAL CHEMICAL

Uniroyal Chemical Company, Inc. Middlebury, CT 06749 EPA REG. NO. 400-416 EPA EST. NO. 011 ACCEPTED
with COMMENTS
In EPA Letter Dated:

SEP 17 2001

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

=400-416

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

Harmful if swallowed. Do not inhale spray mist. Causes eye irritation. Do not get on skin or in eyes. May cause skin irritation. Wash thoroughly all exposed skin. Repeated contact may be harmful.

# 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 A on an EPA chemical resistance category selection chart.

Loaders, applicators and other handlers involved in dry applications to potting soil must wear:long-sleeved shirt and long pants; shoes plus socks; chemical-resistant gloves such as barrier laminate or viton; NIOSH approved respirator 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 an N<sup>2</sup>, R, P or HE prefilter.

All other mixer, loaders, applicators and other handlers must wear:Coveralls over long-sleeved shirt and long pants; chemical-resistant gloves such as barrier laminate or viton; chemical-resistant footwear plus socks; NIOSH approved respirator 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 N<sup>2</sup>, R, P or HE prefilter, chemical-resistant apron when mixing, loading or cleaning equipment.

For use in tobacco floatbeds, application is continuous from the time this product is diluted and pots or plant materials are immersed in the floatbeds through the time the pots or plant materials are removed from the floatbeds and replanted. During the entire application period, any person who contacts the floatbed, the diluted pesticide solution, treated pots or treated plant materials is defined as a handler under the Worker Protection Standard and must be trained as a handler and wear the PPE required for handlers. The 12-hour REI begins once the plant materials are replanted.

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 all other handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Stanadard (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**

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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**

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 when cleaning equipment 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 ground water, 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.

#### **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 this 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 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 12 hours.

INDOOR RESTRICTIONS: Entry (including early entry that would otherwise be permitted under the WPS) into greenhouses, potting sheds, and other indoor areas by any person - other than a correctly trained applicator who is performing a handling task permitted by the WPS and who is wearing the required handler PPE including a respirator - is PROHIBITED in the entire enclosed structure/building from the start of application until application is complete and one of the following ventilation criteria (providing outside air) is met: (1) 10 air exchanges; (2) 2 hours of fans or other mechanical ventilation providing outside air; (3) 4 hours of vents, windows, or other passive ventilation; (4) 11 hours with no ventilation followed by 1 hour of mechanical ventilation; (5) 11 hours of no ventilation followed by 2 hours of passive ventilation; or (6) 24 hours with no ventilation. After ventilation criteria are met and until the REI expires, do not enter or allow worker entry into treated areas, except as provided in the WPS. 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 made of any waterproof material
- · shoes and socks.
- protective eyewear

# **GENERAL INFORMATION**

TERRAZOLE 35WP soil fungicide is effective for prevention and control of damping-off, root rot and stem diseases caused by *Pythium* and *Phytophthora* species in golf course turf, ornamentals and nursery crops.

# **MIXING INSTRUCTIONS**

Fill the mixing tank with half the required amount of water. Then add TERRAZOLE 35WP with agitation running to insure proper mixing and suspension of product. Fill the tank with the remaining amount of required water.

The mixture of TERRAZOLE 35WP and water should be continuously agitated to assure uniform application.

COMPATIBILITY: For broad spectrum disease control, this product can be tank mixed with TERRACLOR® 75%WP (EPA Reg. No. 400-399) or TERRACLOR® 400 (EPA Reg. No. 400-454) for use on ornamentals in accordance with the more restrictive label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Do not mix with other chemicals unless prior use has proven compatibility.

#### **GOLF COURSE TURF - TEES AND GREENS**

TERRAZOLE 35WP is effective for the control of Pythium blight, cottony blight, grease spot, spot blight, root rot, crown rot and damping-off disease caused by Pythium spp.

Application is limited to tees and greens. Application to fairways is prohibited.

Do not allow animals to graze on treated areas and do not feed clippings from treated areas to animals.

## **APPLICATION NOTES**

TERRAZOLE 35WP can be applied as a spray to both newly seeded and established turf.

Within the rate range given, use the lower rate for the shortest interval listed and the higher rate for the longest interval.

Under severe conditions, use the highest rate and shortest interval specified.

The maximum application rate for golf course tees and greens may not exceed 3.8 lbs. ar/A per application.

The maximum amount between application to golf course tees and greens may not exceed 9.6lbs. ai/A per year.

# **USE AND RATE RECOMMENDATIONS**

Mix 2 to 4 ozs. in 2 to 5 gallons of water and apply to 1000 sq. ft. Begin applications at first sign of disease and retreat at 10 to 14 day intervals as needed.

Do not exceed 10 ozs. per 1000 sq. ft. per year.

The interval between applications may not be less than 10 days.

# **ORNAMENTALS**

TERRAZOLE 35WP controls water mold, damping off, root rot, stem rot and crown rot diseases caused by *Pythium spp.* and *Phytophthora spp.* TERRAZOLE 35WP is mixed with water and applied as a soil drench only at the time of seeding or transplanting. For use in commercial nurseries and greenhouses only. Use in residential greenhouses or other indoor plant sites is prohibited.

#### **APPLICATION NOTES**

Apply the recommended rate of TERRAZOLE 35WP according to the guidelines below. The drench solution should be continually agitated to assure uniform application of the fungicide material. To improve penetration of the fungicide, the drenching must be followed with an additional quantity of water equal to at least half the volume of the fungicidal drench, applied either by sprinkling or irrigation.

# For Bed and Bench Grown Plants:

Coverage for TERRAZOLE 35WP Drench			
Soil Depth (inches)	Sq.ft./100 gals.	Fl.oz./Sq.ft.	
3 or less	800	16	
4	600	21	
5	480	27	
6	400	32	
7	340	37	
8	300	43	
9	270	48	
10	240	53	
12 or more	200	64	

#### For Container Grown Plants:

Pot Diameter (inches)	Minimum Drench Volume fl.oz./pot	
4	2	
5	3	1
6	4	
8	10	
10	20	
12	30	-

#### **USE AND RATE RECOMMENDATIONS**

CROP	OUNCES TERRAZOLE 35WP PER 100 GALS. (TSP./GAL)	REMARKS
Bedding plants Flowering plants Foliage plants Woody ornamentals	3.5 - 10 (½ - 1½)	Retreat at 4 to 12 week intervals as necessary. Use higher rates for peat and other high organic potting media.

**PLANT TOLERANCE:** The list below contains those ornamental plants on which TERRAZOLE 35WP has been found to be safe when the product is used according to label directions.

#### Bedding Plants

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•	Dogging Figure			
	Ageratum	Carnation	Impatiens	Salvia
	Alyssum	Celosia	Marigold	Snapdragon
	Aster	Coleus	Pansy	Verbena
	Balsam	Dahlia	Petunia	Vinca
	Begonia	Dianthus	Phlox	Zinnia
	Calendula	Dusty Miller	Portulaca	
	Flowering Plants			
	African	Coral Bells	Geranium	Poinsettia
	Violet	Cyclamen	Gerbera	Primrose
	Begonia	Dahlia	Gloxinia	Statice
	Calceolaria	Daisy, Shasta	Gypsophila	Stokesia
	Carnation	Delphinium	Kalanchoe	
	Chrysthemum	Foxalove	Lillies	
	Columbine	Gaillardia	Orchids	
	Foliage Plants			
	Aglaonema	Caladium	Hedera	Pothos
	Ajuga	Dieffenbachia	Palm, Areca	Sansevieria
	Anthurium	Dracena	Peperomia	Schefflera
	Artemesia	Echeveria	Philodendron	Schlumbergera
	Begonia	Ficus	Pilea	Syngonium
	Dogoma	1 1000	I IIGU	Oyngonium

# **Woody Ornamentals**

Araucaria	Daphne	Juniper	Pittosporum
Arborvitae	Dogwood	Laurel	Podocarpus
Arctostaphylus	Euonymus	Leucothoe	Privet
Aucuba	Fir	Ligustrum	Rhamnus
Azalea	Heather	Magnolia	Rhododendron
Camellia	Hedera	Maple	Yew
Carissa	Hemlock	Pieris	
Ceonothus	Holly	Pine	

Neither the manufacturer nor the seller has determined whether or not TERRAZOLE 35WP can be used safely on ornamental plants not specified on this label. Prior to any large scale application on such plants, the user should determine the safety of TERRAZOLE 35WP fungicide by testing a small number of the type of plants to be treated at the recommended rates for that particular group, i.e., bedding plants, foliage, etc. The user assumes all risks arising out of application to unlabeled plants.

#### **TOBACCO**

# FOR PYTHIUM ROOT ROT CONTROL IN TOBACCO TRANSPLANT FLOAT BEDS (GREENHOUSE OR OUTDOOR FLOAT-BED SYSTEMS)

For preventive control of *Pythium* root rot in tobacco transplants growing in the float bed system, apply and thoroughly mix 2 fl. oz. of TERRAZOLE 35WP per 100 gallons of float bed water. Make applications starting two to three weeks after seeding. A second application at 2 oz./100 gallons of float water can be made two weeks after the first but no later than eight weeks after seeding. No more than two applications can be made to each crop of transplants (seeding to transplanting in the field) regardless of how many times it is moved to different float beds. Care should be taken when moving plants to new locations to avoid treating a second time at an interval of less than two weeks as increased phytotoxicity could occur. TERRAZOLE 35WP can also be used as a curative treatment when disease symptoms first appear.

It is essential that TERRAZOLE 35WP be evenly distributed throughout the float bed water. The TERRAZOLE 35WP needed to treat a float bed or given area should first be mixed well with water in a container, such as a 5 gal. bucket or larger container to form a solution. This solution should then be added uniformly at several locations to the pool of float water and thoroughly mixed into the water in order to achieve uniform Terrazole rates throughout the whole float bed.

Only apply this product to pools (bays) of water being used in the tobacco float bed system. Do not apply this product through any other type of irrigation system or to tobacco transplants produced in any other manner including traditional ground plant beds. Overhead irrigation or drenching will result in additional crop injury. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.

If you have questions about calibration, you should contact County Extension Agents for Agriculture, equipment manufacturers or other knowledgeable experts.

Injury expressed as temporary stunting and leaf bleaching has been observed in tobacco transplants with the use of TERRAZOLE 35WP in float beds. Because of the potential for phytotoxicity, the user must assume responsibility for any plant injury, including stunting and loss of transplants, that may occur as a result of this use of TERRAZOLE 35WP.

PPE Requirements: For use in tobacco floatbeds, application is continuous from the time this product is diluted and pots or plant materials are immersed in the floatbeds through the time the pots or plant materials are removed from the floatbeds and replanted. During the entire application period, any person who contacts the floatbed, the diluted pesticide solution, treated pots, or treated plant material is defined as a handler under the Worker Protection

Standard and must be trained as a handler and wear the PPE required for handlers on the main Terrazole label. The 12-hour REI begins once the plant materials are replanted.

Disposal of Treated Float Water: At the conclusion of transplant production, allow the Terrazole to dissipate from the water through a 3-day evaporation period: During that time all trays will be removed from the bay of water, ventilation will be maximized by uncovering outdoor float beds when not raining and opening all greenhouse ventilators. Afterwards, use the remaining water for transplanting tobacco into the field or permit treated float bed water to evaporate.

Float Bed Liner Disposal: Puncture and dispose of in a sanitary landfill or by incineration if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Note: Keep people, pets and wildlife away from treated float beds after tobacco plants have been removed until water and plastic liners have been disposed of.

#### **USE DIRECTIONS FOR CHEMIGATION:**

In addition to the above use rates and recommendations, the following precautions must be observed when using this product in any type of irrigation system:

Apply this product only through the following systems:

1) Pressurized drench (flood) of drip (trickle) systems, 2) Microirrigation such as spaghetti-tube or individual tube irrigation, 3) Hand-held calibrated irrigation equipment such as the hand-held wand with injector, 4) Ebb and flow systems.

Do not apply this product through any other type of irrigation system. The Terrazole mixture should be continually agitated to assure uniform application of the fungicide material. To improve penetration of the fungicide, the drenching must be followed with an additional quantity of water equal to at least half the volume of the fungicidal drench, applied either by sprinkling or irrigation.

Crop injury or lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts

Do not connect an irrigation system, (including greenhouse systems), used for pesticide application to a public water system unless the pesticide label prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

The pesticide injection pipeline must contain a functional, automatic, quick closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

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Do not apply when wind speed favors drift beyond the area intended for treatment.

# SYSTEMS CONNECTED TO PUBLIC WATER SYSTEMS

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days of the year.

Chemigation systems connected to public water systems must contain a functional, reduced pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water systems should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The pesticide injection pipeline must contain a functional, automatic, quick closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where the pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

# STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Paper Bags: Completely empty 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.

Plastic Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or 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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