

RM 25 400-417

File 10/6



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

FEB 23 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Frederick J. Hageman
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. 400-417
TERRAZOLE 25% EMULSIFIABLE

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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Printed with Soy/Canola ink on paper that
contains at least 50% recycled fiber

2076

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

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

TERRAZOLE®

25% EMULSIFIABLE
ORNAMENTAL FUNGICIDE

**UNIROYAL
CHEMICAL**

ACCEPTED
with COMMENTS
in EPA Letter Dated

FEB 23 1994

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

400-417

COMPOSITION

Active Ingredients: (% by weight)	
5-Ethoxy-3-(trichloromethyl)-1,2,4-thiadiazole*	25.0%
Inert Ingredients**	75.0%
Total:	100.0%

*Contains 2 lbs. 5-Ethoxy-3-(trichloromethyl)-1,2,4-thiadiazole per U.S. Gallon at 68°F.

**Contains Petroleum Distillates

UNIROYAL CHEMICAL COMPANY, INC., Middlebury, CT 06749

002WPS

EPA REG. NO. 400-417

EPA EST. NO.

NET WEIGHT

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Avoid alcohol. Obtain prompt medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO ATTENDING PHYSICIAN: Probable mucosal damage and the presence of petroleum distillates in the formulation may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS

AND DOMESTIC ANIMALS

DANGER

Corrosive, causes irreversible eye damage. Harmful if swallowed. Do not take internally. Do not inhale vapors or spray mist. Do not get in eyes or on clothing. ~~Wear goggles or face shield. May cause skin irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.~~ *delete*

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 Must Wear: Coveralls over short-sleeved shirt and short pants; chemical-resistant gloves such as barrier laminate; chemical-resistant footwear plus socks; protective eyewear; chemical-resistant headgear for overhead exposure; chemical-resistant apron when cleaning equipment, mixing, or loading.

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

Do not apply directly to water. 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.

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.

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VITON

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.

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 + VITON
- chemical-resistant footwear plus socks
- protective eyewear
- chemical-resistant headgear for overhead exposure

Terrazole is useful as a soil fungicide for control of damping-off, root and stem diseases caused by Pythium and Phytophthora. Use only at recommended rates as overdosage may be harmful to sensitive plants. Do not mix with other chemicals, other than Terraclor® unless prior use has proven compatibility. 6096

RECOMMENDATIONS

For bedding and bench plantings: Use with water as a soil drench at time of seeding and transplanting in commercial nurseries and greenhouses. The drench solution should be continually agitated to assure uniform application of the fungicidal material. To improve penetration of the fungicide, the drenching should be followed with an equal quantity of water applied either by sprinkling or by irrigation.

BEDDING PLANTS				BEDDING PLANTS: (Soil 2" to 3" Deep) -Add 3 to 4 ozs. to 100 gallons of water and apply to 400 sq. ft. of bed area. Repeat application may be made at one to two month intervals, if necessary
Ajuga	Chrysanthemum	Larkspur	Salvia	
Alyssum	Coleus	Marigold	Snapdragon	
Calendula	Dahlia	Pansy	Verbena	
Celosia	Dianthus	Petunia	Vinca	
Cineraria	Dusty Miller	Phlox	Zinnia	
FOLIAGE PLANTS				TROPICAL FOLIAGE, HERBACEOUS and WOODY PLANTS: (Peat and other high organic media 6" deep)- Bed and Bench Plantings: Add 4 to 8 ozs. in 100 gallons of water and apply to 400 sq. ft. of bed or bench area. Repeat application at two to three month intervals to maintain disease control. Pot Plantings: Use ½ pint solution per 6" pot or in sufficient amount to saturate the soil.
Aglaonema	Chamaedorea	Maranta	Sansevieria	
Anthurium	Chinese Evergreen	Nephrolepis	Stromanthe	
Areca Palm	Crassula	Nephtytis	Zygocactus	
Brassaia	Dieffenbachia	Peperomia		
Cactus	Gynura	Philodendron		
Caladium	Hedera	Pilea		
Calathea	Hoya	Pothos		
HERBACEOUS PLANTS				
African Violet	Chrysanthemum	Easter Lily	Geranium	
Gerbera	Kalanchoe	Poinsettia	Sinningia	
WOODY PLANTS				
Azalea	Ficus	Pieris	Red Pine	
Boxwood	Juniper	Podocarpus	Rhododendron	
Euonymus	Maple			

STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or residue 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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REST AVAILABLE COPY

Proposed WPS Labeling

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

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