

400-456

04/10/2007

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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
199 Benson Road (2-4)
Middlebury, CT 06749

APR 10 2007

Subject: Terraclor SuperX[®] 18.8G
EPA Reg. No. 400-456
Your 90 day response to etridiazole DCI dated February 23, 2007
EPA Decision Number 321783

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 change is made: Use the complete mailing address of Crompton Corporation on the first page of the label.

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 ingredients 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

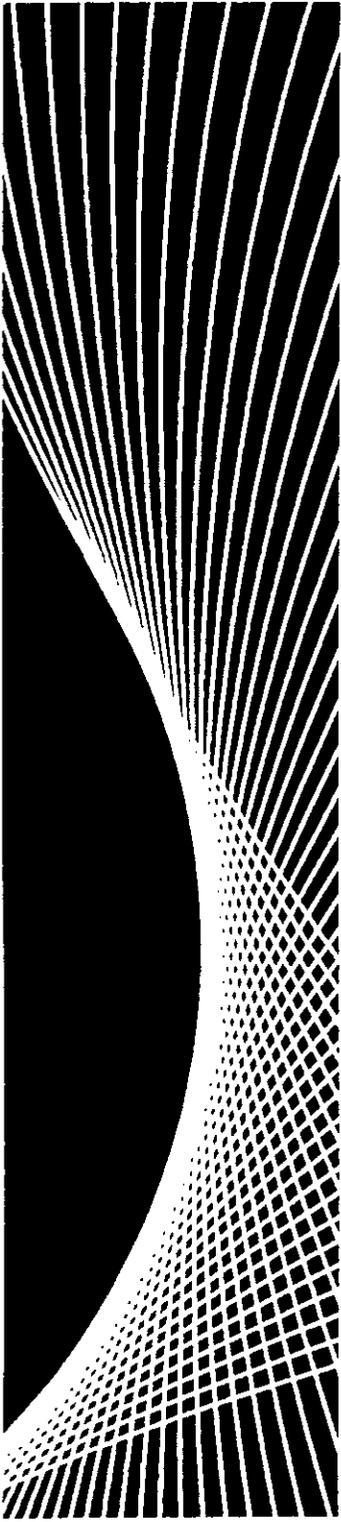
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APR 10 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No. 400-456

TERRACLOR SUPER X[®] 18.8G

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

Net
contents:



SOIL FUNGICIDE For Cotton

Active Ingredient: (% by weight)	
PCNB: Pentachloronitrobenzene	15.0%
Etridiazole: 5-Ethoxy-3-(trichloromethyl)-1,2,4-thiadiazole	3.8%
Other Ingredients*:	81.2%
Total	100.0%

*Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

- | | |
|---------------------|--|
| IF SWALLOWED | <ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • 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 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. |

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

This product may pose an aspiration pneumonia hazard. Contains petroleum distillate.

EPA Reg. No. 400-456
EPA Est. No.
008

Manufactured for:
Chemtura USA Corporation
Middlebury, CT 06749



www.chemtura.com

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

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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

Loaders, Applicators and Other Handlers Must Wear: A long-sleeved shirt & long pants; shoes plus socks.

In addition, all handlers, except for applicators applying in-furrow to cotton, must wear: chemical resistant gloves, and 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 any N², R, P, or HE prefilter.

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. Cover, collect or incorporate treated granules. 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 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 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.

PHYSICAL OR CHEMICAL HAZARDS

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

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 applications.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Do not allow this product to drift.

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.

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.

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 made out of any waterproof material
- shoes plus socks

CALIBRATION

Granular applicators should be properly calibrated to deliver the desired amount of Terraclor Super X 18.8G per acre. Variations in physical characteristics of the product as well as the type and age of equipment make it essential/important to calibrate applicators prior to the start of each use season.

CALIBRATION PROCEDURE

1. Read the product label and select the desired rate. Higher rates should always be used when germination factors are expected to be unfavorable for rapid emergence.
2. Fill the granular hopper with Terraclor Super X 18.8G.
3. Attach a Chemtura calibration tube to each hopper box. Because delivery rates for each hopper box may vary, each box should be calibrated separately.
4. Mark off 300 feet. Drive that distance at normal operating speed and collect the granules delivered from each hopper.
5. Tap the tube to settle granules. Take reading on the tube - refer to the following chart for approximate rate per acre.

Tube Reading and Equivalent Ounces of Terraclor Super X 18.8G		POUNDS PER ACRE			
		row spacing (inches)			
		40	38	36	30
M	16.0	13.1	13.8	14.5	17.5
L	14.7	12.0	12.6	13.3	16.0
K	13.7	11.2	11.7	12.4	15.0
J	12.3	10.1	10.6	11.2	13.5
I	11.0	9.0	9.5	10.0	12.0
H	10.0	8.2	8.6	9.1	10.9
G	8.7	7.1	7.4	7.9	9.5
F	7.3	6.0	6.3	6.7	8.0
E	6.0	4.9	5.2	5.4	6.5
D	5.0	4.1	4.3	4.5	5.5
Minimum use rate per row spacing		5.5	5.8	6.1	7.3

The pounds per acre is based on 13068 linear feet of row using 40 inch rows, on 13756 or linear feet of row using 38 inch rows, on 14520 of linear feet of row using 36 inch rows or 17424 linear feet of row using 30 inch rows.

COTTON

(Seedling Disease Complex - *Rhizoctonia*, *Pythium* and *Fusarium*)

SOIL IN-FURROW APPLICATION: At planting time, use 5.5 to 10 lbs. per acre (6.7 to 12.3 oz. per 1,000 feet of row at 40 inch row spacing).

Apply over the seed and to the covering soil, using suitable equipment. Apply the specified dosage to the soil around the seed and to the covering soil as it fills in the furrow. The soil around the seed and the covering soil should be thoroughly mixed with the product.

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 no till programs are utilized.

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 allow the feeding or grazing of cotton foliage by livestock.

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. 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 - 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, expressed or implied, extends to the use of this product, contrary to label instructions, or under conditions not reasonably foreseeable to seller, and to the extent consistent with applicable law, the buyer assumes the risk of any such use.

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