

APR 21 2000

Ms. Judy Ball
Uniroyal Chemical Company, Inc.
74 Amity Road
Bethany, CT 06524-3402

Dear Ms Ball:

Subject: Micromite 25W
EPA Registration No. 400-471
Your submissions dated January 13, 2000, and January 29, 2000
Revised labeling: compliance with PRB review; expanded use for citrus to
remove geographical limitations and add aerial application; revised basic product
name and confidential statement of formula (CSF)

The labeling referred to above, submitted in connection with registration/reregistration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below:

1. The product name has been revised to Micromite 25WS. Henceforth this is the only name for this product, and all other names are now considered obsolete. You will have to send a notification of any additional brand names that you may wish to use in future.
2. Move the title "Precautionary Statements" to below the First Aid statement, so that the First Aid block is not broken.
3. Revised basic Confidential Statement of Formula (CSF) dated 1/14/2000 is not acceptable as submitted. As indicated to you over the phone, you need to send us the correct CAS number for fatty alcohol sulfate, and provide information on composition of Solublon KA and Solublon PT.
4. Add mixing, loading, and handling instructions for the water soluble packages, indicating the number of packages and spray volume required per acre.

5. Add appropriate use precautions for the water soluble package to the label. Some of the precautions are suggested below:

- a. Do not sell individual water soluble packages.
- b. Do not handle inner package with wet hands or gloves.
- c. Do not allow packages to become wet prior to adding to the spray tank.
- d. Handle outer container carefully to avoid breakage of inner water soluble packages.
- e. Always reseal outer container in a manner that protects remaining water soluble packages from moisture.
- f. Do not remove the water soluble packages from the container except for immediate use.
- g. Use the entire contents of a water soluble package, do not break open to use partial contents of a water soluble package.

6. A preliminary toxicity assessment to aquatic invertebrates suggests that diflubenzuron is similar or less in toxicity to other chemicals registered for the same use. On the basis of this preliminary assessment, the expanded use for citrus is acceptable. Please note that more comments may be forthcoming when our review of the probabilistic risk assessment submitted by you is complete. This expanded use will be reevaluated prior to reregistration of this product, and some use restrictions may be required at that time.

7. Submit five (5) copies of your final printed label 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 sec. 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 for your records.

Sincerely yours,

Rita Kumar

Rita Kumar
Senior Regulatory Specialist
Insecticide-Rodenticide Branch
Registration Division (7505C)
e-mail: kumar.rita@epa.gov

Enclosure

RESTRICTED USE PESTICIDE

Due to toxicity to aquatic invertebrate animals. 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.

WATER SOLUBLE PACKAGE - 4 x 10 oz. POUCHES PER BAG.
DO NOT MIX WITH BORON PRODUCTS.

MICROMITE® 25WS

INSECT GROWTH REGULATOR FOR USE ON CITRUS

COMPOSITION

Active Ingredient: (% by weight)

Diflubenzuron N-[[[4-Chlorophenyl]amino]carbonyl]-2,6-difluorobenzamide..... 25%

Inert Ingredients: 75%

TOTAL 100%

EMERGENCY ASSISTANCE:

UNIROYAL CHEMICAL EMERGENCY PHONE 203-723-3670

SAFETY DATA AND INFORMATION 203-573-3303

TRANSPORTATION EMERGENCY (CHEMTREC) 800-424-9300

Have the product container or label with you when calling a doctor or going for treatment.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2000

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

400-471

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

FIRST AID

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and Other Handlers Must Wear: Long-sleeved shirt and long pants; chemical-resistant gloves; shoes plus socks.

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 REQUIREMENTS

Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENGINEERING CONTROLS

When handlers use closed systems (including water soluble bags), enclosed cabs or aircraft 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 in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- 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 aquatic invertebrates. For terrestrial uses (other than on forest canopy to control forest pests), do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark, except under the forest canopy when used to control forest pests. Drift or runoff from treated areas may be hazardous to aquatic invertebrate organisms in neighboring areas. Do not contaminate water when disposing of equipment wastewater or rinsate.



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 Part 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.

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
- shoes plus socks.

STORAGE AND DISPOSAL

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

STORAGE — Store in a dry location.

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 — 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.

GENERAL INSTRUCTIONS AND INFORMATION

Do not apply this product through any type of irrigation system.

SPRAY DRIFT LABELING

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions. The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

Information on Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets re-

duces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size

Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- **Number of nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from the horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length

For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height

Applications should not be made at a height greater than 10 feet above the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment

When applications are made with a cross-wind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for the displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

Wind

Drift potential is lowest between wind speed of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect drift.

Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are hot and dry.

Temperature Inversions

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upwards and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

GENERAL INFORMATION

MICROMITE 25WS is compatible with many commonly used citrus pesticides, crop oils, and nutritional sprays. However, because of the large number of possible tank mixes, users should pre-test to assure himself of the physical and non-phytotoxic compatibility of any proposed mixtures with MICROMITE 25WS.

MICROMITE 25WS has shown little or no effect on certain beneficial organisms such as the snowscale parasite, *Aphytis lingnanensis*, the citrus rust mite pathogenic fungus, *Hirsutella thompsonii*, and bees.

Consult local agricultural authorities such as county and university extension specialists on current recommendations and refer to the Florida Citrus Pest Management Guide.

MICROMITE 25WS should be used in conjunction with IPM practices including the early detection of target insect populations, threshold treatment levels, cultural control practices, and other procedures to manage target pest populations. Refer to local extension or university personnel regarding recommended IPM practices.

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not apply this product to bodies of water where swimming is likely. Do not apply more than 3.75 pounds of MICROMITE 25WS per acre per year. Do not apply within 21 days of harvest.

Do not harvest cover crops for animal feed or graze livestock in treated groves.

For Ground Application: Do not apply within 25 feet of bodies of water such as lakes, reservoirs, rivers, permanent streams, natural ponds, marshes or estuaries.

Spray last three rows windward of surface water using nozzles on one side only, with spray directed away from surface water. Avoid spray going over tops of trees by adjusting or turning off top nozzles. Shut off nozzles on the side away from the grove when spraying the outside row. Shut off nozzles when turning at ends of rows and passing tree gaps in rows.

For Aerial Application: Do not apply within 150 feet of bodies of water such as lakes, reservoirs, rivers, permanent streams, natural ponds, marshes or estuaries.

APPLICATION INSTRUCTIONS

CITRUS RUST MITE: To control citrus rust mites on oranges, grapefruit and tangerines, apply MICROMITE 25WS at 1.25 pounds of MICROMITE 25WS per acre in sufficient water to ensure thorough coverage (50 - 1,000 gallons per acre by ground application; 5 to 20 gallons per acre by aerial application). Repeat application no closer than 90 days apart to maintain full season rust mite control.

Due to the unique mode of action of MICROMITE 25WS, the full effect of the treatment may not be apparent for 3 - 10 days after application.

LEPIDOPTEROUS LEAFMINERS (*Phyllocnistis citrella*, *Marmara* sp.): On oranges, grapefruit and tangerines, apply 1.25 pounds of MICROMITE 25WS per acre when oviposition begins on new growth flush. Use sufficient spray volume for thorough coverage of leaf surfaces (ground = 50 to 1,000 gallons per acre; aerial = 5 to 20 gallons per acre). Repeat application no closer than 90 days apart for subsequent leaf flushes. The addition of a spray oil, such as FC435-66, enhances coverage and may enhance control of citrus leafminers.

MICROMITE 25WS will not kill adult stages of leafminers. MICROMITE 25WS has activity on eggs, larval and pupal stages.

CITRUS ROOT WEEVIL COMPLEX: On oranges, grapefruit and tangerines apply 1.25 pounds of MICROMITE 25WS per acre to control citrus root weevil species, which include the West Indian sugarcane rootstock

borer weevil (*Diaprepes abbreviatus*), the southern blue-green citrus root weevil (*Pachnaeus litus*), the blue-green citrus weevil (*Pachnaeus opalus*), the Fuller rose beetle (*Asynonychus godmani*), and the little leaf notcher (*Artipus floridanus*). Apply MICROMITE 25WS to newly expanded flush on citrus and/or when adult weevils are present. Use sufficient spray volume for thorough coverage of leaf surfaces (ground = 50 to 1,000 gallons per acre; aerial = 5 to 20 gallons per acre). Repeat application no closer than 90 days apart for subsequent leaf flushes and/or when adult weevils are present. The addition of a spray oil, such as FC435-66, enhances coverage and penetration of MICROMITE 25WS into the adult weevils and eggs. Also, oil will deter attachment of weevil egg masses to leaf surfaces.

MICROMITE 25WS will not kill adult weevils. The activity of MICROMITE 25WS is through ingestion or contact and will result in reduction of the reproductive potential of weevils, it prevents eggs from hatching, thus preventing larvae from entering soil and feeding on citrus tree roots. Also, the grubs from eggs laid on treated leaves are reduced in number.

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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