



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 27, 2021

Brad Glenn, Ph.D.
Regulatory Affairs Consultant
Bayer Crop Science, Environmental Science Division
5000 Centre Green Way, Suite 400
Cary, NC 27513

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Adding Referral Statement and updating the address.
Product Name: ES TC0006A
EPA Registration Number: 432-1522
Application Date: 11/22/2019
OPP Case Number: 00074859
Submission Number: 1044422

Dear Dr. Glenn:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration

process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

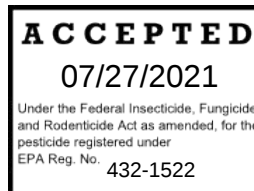
If you have any questions, please contact Menyon Adams by phone at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Andrew C. Bryceland". The signature is fluid and cursive, with the first name "Andrew" and last name "Bryceland" clearly legible.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure



ES TC006A

(ABN: FIATA™; FIATA™ StressGard™)

A SYSTEMIC FUNGICIDE AND BOOSTER OF PLANT DEFENSE MECHANISMS THAT PROMOTES DROUGHT TOLERANCE AND HELPS CONTROL LISTED DISEASES OF TURFGRASS

ACTIVE INGREDIENT: Mono- and di-potassium salts of phosphorous acid *.....25.85%

OTHER INGREDIENTS: 74.15%

TOTAL: 100.00%

* Contains 2.64 lb active ingredient per gal; equivalent to 1.73 lb phosphorous acid per gal (17.0% w/w)

EPA Reg. No. 432-1522

EPA Est. No. _____

KEEP OUT OF REACH OF CHILDREN

See [Back][Side] Panel for First Aid Instructions and [Leaflet][Booklet] for Complete Precautionary Statements and Directions for Use. (Note to reviewer: Location of additional precautionary statements, directions for use will vary between those listed, depending on container type/size.)

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577

For PRODUCT USE Information, Call 1-800-331-2867

FIRST AID

If swallowed:

- Immediately call a poison control center or doctor for treatment advice.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Have person sip a glass of water if able to swallow.
- Do not give anything by mouth to an unconscious person.

For MEDICAL Emergencies Call 24 Hours A Day 1-800-334-7577.

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

For Terrestrial Uses

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 disposing of rinsate or equipment washwaters.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear long-sleeved shirt and long pants, and shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENT

When handlers use closed systems, 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:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove PPE clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

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 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 of 4 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, waterproof gloves, shoes plus socks, and protective eyewear.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter treated areas without protective clothing until sprays have dried.

PLANT HEALTH RESPONSES

ES TC006A, when applied at the prescribed rates and intervals, promotes healthier roots, and increases plant drought tolerance and improves plant water utilization. This leads to a reduction in the need for hand watering and a general saving of water use. The resulting improvement in function of these healthier roots leads to more efficient uptake of plant nutrients. Improving cell turgidity results in a healthier and sturdier plant structure, reducing the impact of traffic or mechanical damage. These effects are consistent with the properties of anti-oxidants. A property of ES TC006A is to act as an inducer of systemic resistance in plants resulting in production of plant metabolites responsible for improving plant processes and increasing resistance to diseases.

Cool-season grasses such as tall fescues, bluegrasses, and bentgrasses are prone to damage during summer heat and summer decline leading to reduced root mass in the summer months. Turf treated with ES TC006A retains turf quality through summer stress by alleviating plant stresses, enhancing disease resistance through induced system resistance, and protecting the plant from the adverse effects of solar radiation.

Warm-season grasses, such as Bermudagrass and Zoysiagrass, influenced by the effects of insufficient sunlight during the spring and fall, are prone to losing chlorophyll and premature senescence. ES TC006A reduces the negative effects on plant growth promoting earlier spring green-up, turf fill-in, and extended turf quality in the fall.

PRODUCT INFORMATION

ES TC006A must be applied as a foliar spray. Apply ES TC006A with sufficient water volumes for adequate coverage of foliage, according to the turf growth stage.

STAINING PRECAUTION

This product may cause staining. Avoid off-target sites such as sidewalks, patios, driveways, pavers, or similar materials. Do not enter treated areas until spray has dried. Rinse spray equipment thoroughly with warm water and detergent.

MIXING INSTRUCTIONS

1. Fill the spray tank with 1/4 - 1/2 of the required volume of water before adding ES TC006A.
2. Add ES TC006A slowly to the tank and agitate by hydraulic or mechanical means.
3. Continue to fill the tank with water to the desired volume while agitating.
4. Continue agitation when applying.

COMPATIBILITY

ES TC006A is compatible with most products used on turf; however, turfgrass sensitivity to these mixtures may vary. In particular, certain foliar fertilizers and copper products may not be compatible with ES TC006A and the combined use may cause phytotoxicity to certain plants. If these combinations or others have not been used before, do not tank mix without first testing the mixture's compatibility nor apply it without assessing its safety to the turfgrass (phytotoxicity).

To determine the compatibility of ES TC006A with other products, use a jar compatibility test. Add the correct proportions of each product and the appropriate quantity of water to clean container, thoroughly mix, then let stand for 3 - 5 minutes. If the mixture remains in solution or can be remixed readily, the products are considered compatible. To determine if a combination is phytotoxic to a specific turf, spray a small area and then evaluate 3 - 7 days later for visual effects.

TURF

ES TC006A is a systemic fungicide and booster of plant defense mechanisms that is used for the suppression of Pythium blight and damping-off diseases of turfgrass on sod farms, golf courses, sport fields, parks, residential and commercial sites. Begin preventative applications when conditions first favor disease and repeat at prescribed intervals. Use higher rates under severe disease conditions.

DISEASE	APPLICATION METHOD	RATE	APPLICATION PROGRAM
Pythium	Foliar Spray	5 to 15 fl. oz./1,000 sq. ft.	Apply approved amount in 1 to 5 gal of water per 1,000 square feet. Thoroughly wet the foliage. Apply at 14 to 28 day intervals as needed. Do not mow or irrigate treated area until sprays have completely dried.

ES TC006A has a plant health component that is used for the prevention or alleviation of stress from drought, solar radiation and other oxidative processes on turfgrasses on sod farms, golf courses, sport fields, parks, residential and commercial sites. Begin preventative applications prior to the occurrence of adverse weather conditions or before watering restrictions are imposed and repeat at prescribed intervals. Use higher rates under severe drought conditions or irrigation reduction. ES TC006A does not replace the use of soil amending adjuvants for soil hydrophobicity and should be used in conjunction with best turf management practices.

DROUGHT TOLERANCE	APPLICATION METHOD	RATE	APPLICATION PROGRAM
Irrigation reduction of 20 to 50% or during periods of low rainfall for up to 4 to 9 weeks	Foliar Spray	5 to 15 fl. oz./1,000 sq. ft.	Apply approved amount in 1 to 5 gal of water per 1,000 square feet. Thoroughly wet the foliage. Apply at 14 to 28 day intervals as needed to fairway or lawn height cut turf. Do not mow or irrigate treated area until sprays have completely dried.

Optimal results for overall turfgrass health are achieved when using the following prescribed combination or a sequential applications in a preventative program for disease control.

PRESCRIBED TANK-MIXTURES	RATE FL OZ / 1000 SQ. FT
Fiata + Tartan®, or + Interface®, or + Bayleton®, or + Mirage™ StressGard	4.4 to 6 1 to 2 3 to 5 0.5 to 1 1 to 2
Applications Make applications of the fungicide as prescribed on the specific fungicide label. Use in a minimum spray water volume of 2 gal per 1000 sq. ft. Use lower rates of Fiata for shorter spray intervals.	

The addition of 4.5 to 6 fl oz of Fiata to any product containing trinexapac- ethyl such as Primo MAXX at prescribed label rates for turfgrass growth regulation enhances the level of tolerance to stress conditions, and the consistency of turf greenness.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

Keep this product in containers stored upright and secured with the original closure. Do not store this product near heat sources. If transfer to another container becomes necessary, ensure that the container is clearly labeled, the container is a type suitable for the product, and is clean and free of other materials.

PESTICIDE DISPOSAL:

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 HANDLING:

Rigid, Non-refillable containers less than 5 gallons

Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Rigid Non-refillable containers that are too large to shake (i.e., with capacities greater than 5 gallons or 50 lbs)

Non-refillable containers - Do not reuse or refill this container. Refer to Bottom Discharge IBC or Top Discharge IBC, Drums, Kegs information as follows.

Bottom Discharge IBC (e.g. – Schuetz Caged IBC or Snyder Square Stackable)

Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. To pressure rinse the container before final disposal, empty the remaining contents from the IBC into application equipment or mix tank. Raise the bottom of the IBC by 1.5 inches on the side which is opposite of the bottom discharge valve to promote more complete product removal. Completely remove the top lid of the IBC. Use water pressurized to at least 40 PSI to rinse all interior portions. Continuously pump or drain rinsate into application equipment or rinsate collection system while pressure rinsing. Continue pressure rinsing for 2 minutes or until rinsate becomes clear. Replace the lid and close bottom valve.

Top Discharge IBC, Drums, Kegs (e.g. – Snyder 120 Next Gen, Bonar B120, Drums, Kegs).

Triple rinsing the container before final disposal is the responsibility of the person disposing of the container. To triple rinse the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container at least 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Rinse all interior surfaces. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

Once container is rinsed, offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties, and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties, and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: BAYER CROPSCIENCE MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of BAYER CROPSCIENCE is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

BATH CODE: _____

NET CONTENTS: [Various (1 gal to 50 gal)]

PRODUCED FOR



Bayer Environmental Science

A Division of Bayer CropScience, LP
5000 CentreGreen Way, Suite 400
Cary, NC 27513

ES TC006A (Pending) 05/10/2019

APPENDIX: Optional Marketing Claims:

Better drought tolerance
Improved water utilization
Saves water expenses
Reduce need for hand watering
Retain turf quality through summer stress
Reduces plant stress thus requiring less watering
Reduce afternoon syringing [note: syringing is a light application of water to turf foliage]
Enhanced disease resistance from a healthier root system
Provides enhanced plant health to minimize water uptake requirements
Drought stress protection
Water optimizing formula
Innovative formula reduces water needs
Turf grass exits dormancy for faster green-up
Provides more efficient root uptake of surrounding soil moisture
Reduce irrigation budget by [XX]%
Reduce cost of watering by [XX]%
Reduce irrigation needs by [XX]%
Greener lawn with [XX]% water requirements
Cut your water bill [XX %]