

PM 03

707-258

7/21/99

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JUL 21 1999

Ann M. Tillman, Ph.D.
Rohm and Haas Company
Independence Mall West
Philadelphia, PA 19105

Subject: Amendment To Add Pome Fruit
Confirm 70 WSP
EPA registration No. 707-258
Application dated January 14, 1997
Letter dated May 25, 1999

Dear Dr. Tillman:

The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide, And Rodenticide Act, as amended adding Pome Fruit is acceptable and a stamped copy of the labeling is enclosed.

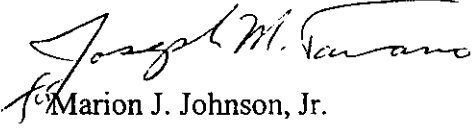
Revise the plant analytical method submitted for enforcement purposes and submit a copy suitable for publication in the Pesticide Analytical manual II.

Rohm and Haas Method TR 34-96-109 has been forwarded to the Analytical Chemistry Branch for method validation. This method must successfully pass this method validation and Rohm and Haas must make any necessary modifications to the method resulting from the laboratory validation.

Submit a revised Section F with a Pome Fruit tolerance of 1.5 ppm and tolerances with the correct residues of regulatory interest and at the levels specified for animal commodities.

If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,



for Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division(7505C)



ACCEPTED
with COMMENTS
In EPA Letter Dated:

3/16

JUL 21 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
707-258

M1b
5/599

ROHM
HAAS 
PHILADELPHIA, PA 19106
Tel: (215) 592-3000

CONFIRM[®] 70 WSP
AGRICULTURAL INSECTICIDE IN WATER-SOLUBLE POUCHES

ACTIVE INGREDIENT

Tebufenozide

Benzoic acid, 3,5-dimethyl-, 1-(1,1-dimethylethyl)-2-(4-ethylbenzoyl) hydrazide.....70%

INERT INGREDIENTS.....30%

TOTAL 100%

EPA REG NO. 707-258

EPA EST. No.

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions.

KEEP OUT OF REACH OF CHILDREN
CAUTION

STATEMENT OF PRACTICAL TREATMENT

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

IF INHALED: Move victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth.

IF ON SKIN: Wash affected skin thoroughly with soap and water. Consult a physician if irritation persists.

IF SWALLOWED: Dilute by giving two glasses of water to drink and consult a physician. Never give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Emesis is recommended.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Harmful if swallowed, inhaled or absorbed through the skin. Do not swallow, get in eyes, on skin or breathe spray mist. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks

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

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standards (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 clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Under some conditions this chemical, may also have high potential for runoff into surface water for several weeks or months after applications. Do not cultivate within 10 feet of aquatic areas so as to allow growth of a vegetative filter strip.

Drift from applications of this pesticide is likely to result in damage to sensitive aquatic invertebrates in water bodies adjacent to treatment area.

For terrestrial uses, 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 forest canopy when aerially applied to control forest pests. Do not contaminate water when disposing of equipment wash-waters and rinsate. Do not apply when weather conditions favor drift or runoff from areas treated.

This pesticide demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

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), notification to workers 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 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
- Water-proof gloves
- Shoes plus socks

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area above freezing. The water-soluble pouch may become brittle at storage temperatures below 32°F. but the insecticide is not affected. Do not remove the water-soluble pouches from the container except for immediate use.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or 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 container into application equipment. 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.

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Appropriate protective equipment must be worn when handling a spill of this material. Transfer spilled material to suitable containers for recovery or disposal. Refer to MSDS (Material Safety Data Sheet).

CONDITIONS OF SALE AND WARRANTY

Rohm and Haas warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. **ROHM AND HAAS MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of Rohm and Haas and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pest, drift to other crops or property or failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL ROHM AND HAAS OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

GENERAL INFORMATION

CONFIRM 70 WSP Agricultural Insecticide mimics the action of the natural insect hormone 20-hydroxyecdysone, the physiological inducer of the molting and metamorphosis process in insects. CONFIRM 70 WSP is highly active against most lepidopterous larvae while having practically no activity at typical use-rates against other orders of insects. The selectivity of CONFIRM 70 WSP allows for the maintenance of the populations of beneficial and predatory insects which is a key element in integrated pest management programs. CONFIRM 70 WSP controls lepidopterous larvae through a novel mode-of-action by the induction of a premature lethal molt which initiates within hours of ingestion of treated crop surfaces. Contact activity has also been observed in some insects. Actual death of the larvae will take several days to occur although feeding by the insects generally ceases within 24 hours of ingestion.

USE RATE DETERMINATION

Carefully read, understand and follow label use rates, recommendations and restrictions. Apply the amount specified in the following table with properly calibrated aerial or ground spray equipment. The low rates may be used for light infestations of the target lepidopterous species and the higher rates for moderate to heavy infestations. CONFIRM 70 WSP Agricultural Insecticide may be applied in either dilute or concentrate sprays so long as the application equipment is calibrated and adjusted to deliver thorough, uniform coverage. Use the specified amount of CONFIRM 70 WSP per acre regardless of spray volume used. Prepare only the amount of spray solution required to treat the measured acreage.

COMPATIBILITY

CONFIRM 70 WSP Agricultural Insecticide is believed to be compatible with most commonly used agricultural fungicides, insecticides, growth regulators, foliar fertilizers and spray adjuvants. If in doubt, the user should consult spray compatibility charts or State Cooperative Extension Specialists prior to preparing tank mixtures.

MIXING

Fill spray tank one-third to one-half full of clean water before adding water-soluble pouches to the spray tank. Place the CONFIRM 70 WSP Agricultural Insecticide pouches in the spray tank and insure that the pouches are completely dissolved before adding other co-applied products. Add the required number of pouches as determined by the dosage recommendations into the tank with continuous agitation. Depending on the water temperature and the degree of agitation, the pouches should completely dissolve within approximately five minutes.

NOTE: CONFIRM 70 WSP Agricultural Insecticide is compatible with boron and spray oils; however, the water soluble pouches must be completely dissolved before adding spray oils or products containing boron to spray mixtures.

HANDLING

The enclosed pouches of CONFIRM 70 WSP Agricultural Insecticide are water soluble. Do not allow pouches to become wet prior to adding to the spray tank. Do not handle the pouches with wet hands or wet gloves. Always reseal overwrap bag to protect remaining unused pouches. Do not remove water-soluble pouches from overwrap except to add directly to the spray tank.

APPLICATION TIMING

The activity of CONFIRM 70 WSP Agricultural Insecticide is expressed primarily through ingestion by the target larvae. Consequently, the timing of application is dependent on the feeding behavior of the target pest. For internal feeding larvae, application must be made prior to the time that surface feeding occurs. For foliar or surface feeding larvae, application made while active feeding is occurring will be effective.

Re-application may be required to protect new flushes of foliage or rapidly expanding fruit. The re-application interval will vary depending on how rapidly the crop is growing and the generation time of the target pest. While CONFIRM 70 WSP Insecticide is essentially equally effective against all instars, it is generally good practice to make applications to early instars to avoid the heavy damage that can be inflicted by later instar larvae.

For best results, begin applications when first signs of feeding damage or when threshold levels of moths, eggs or larvae occur. Consult the Cooperative Extension Service, or other qualified professional authorities to determine the appropriate threshold for application in your area.

APPLICATION INSTRUCTIONS

Because CONFIRM 70 WSP Agricultural Insecticide must be ingested, application must be in a manner that assures uniform and thorough coverage. Higher water volume and increased spray pressure generally provide better coverage. Operating an air-blast sprayer at ground speeds greater than 2 mph and making applications in an alternate row middle pattern may result in less than satisfactory coverage and poor performance, particularly in conditions of high infestation levels, extremely large trees and dense foliage. Avoid application under conditions when uniform coverage cannot be assured or when excessive spray drift may occur.

A minimum of six hours drying time is required between completion of application and the onset of precipitation to ensure retention of the spray deposit.

CHEMIGATION

~~Do not apply this product through any type of irrigation system except as specified for use on cranberries.~~

SPRAY ADJUVANTS

The addition of agricultural adjuvants to CONFIRM 70 WSP Agricultural Insecticide sprays will improve initial spray deposits, redistribution and weatherability. The following spray adjuvants have been especially formulated to optimize the performance of foliar-applied agricultural chemicals and are recommended for use with CONFIRM 70 WSP:

- LATRON B-1956® -A water-dispersible, resin-based nonionic spreader-sticker that resists re-wetting and removal by rain. Effective with dilute sprays applied by ground equipment.
- LATRON CS-7® -A spreader-binder designed specifically for use in concentrate and low volume sprays applied by aircraft or ground equipment.

Place CONFIRM 70 WSP Agricultural Insecticide into suspension prior to adding an adjuvant to the spray mixture. Read and carefully observe the precautionary statements and all other information appearing on all product labels prior to spray preparation.

RESISTANCE MANAGEMENT

Any insect population may contain individuals that are naturally resistant to a specific pesticide, therefore, the use of any one insecticide against many consecutive generations of a pest can result in the development of resistance problems. To prevent or delay the development of resistance, Rohm and Haas Company recommends rotation of CONFIRM 70WSP with insecticides of alternate modes of action and the utilization of Integrated Pest Management practices such as routine monitoring, the use of treatment thresholds to time applications and cultural and biological controls wherever possible. We further recommend that CONFIRM 70WSP not be used on more than three consecutive generations of a pest. Since the development of resistance cannot be predicted we suggest that you consult local or State Extension personnel or your local Rohm and Haas Company representative for resistance management guidance appropriate to your crop, locality and production practices.

ROTATIONAL CROP RESTRICTIONS

The following rotational crops may be planted at intervals defined below following the final application of CONFIRM 70 WSP Agricultural Insecticide at the recommended rates for a registered use.

CROP	RE-CROPPING INTERVAL
Crops for which CONFIRM 70 WSP use is registered	No restrictions
Root/tuber/bulb crops, cucurbit vegetables,	30 days
All other crops grown for food and feed including Legume vegetables, cereal grains, grasses and non-grass animal feeds	12 months

Note: When using CONFIRM 70WSP with other registered pesticides, always refer to rotational restrictions and precautions on the other product's label and comply with the most restrictive rotational guidelines.

USE DIRECTIONS FOR COLE CROPS AND LEAFY VEGETABLES*

Ground Application: Apply a minimum of 10 gallons per acre by conventional ground equipment to young crop and small plants. Apply a minimum of 20 gallons per acre to densely foliated or difficult-to-cover crops to ensure thorough coverage.

Aerial Application: Make applications of CONFIRM 70WSP in a minimum of 10 gallons per acre.

Spray Adjuvants: One pint of LATRON CS-7 Spray Adjuvant per 100 gallons of spray mixture or similar spreader-binder is recommended to maximize coverage and distribution of the spray material.

TARGET PESTS	APPLICATION RATE (Acres per pouch**)	APPLICATION TIMING	RESTRICTIONS
Cabbage looper Imported cabbageworm Beet armyworm Fall armyworm Southern armyworm True armyworm Garden webworm Yellowstriped armyworm Cross-striped cabbageworm Cabbage webworm	2.4 to 3.5 (0.13 to 0.09 lb. ai/acre)	For early season applications only to young crop and small plants. Begin applications when first signs of feeding damage appear or when infestations reach threshold levels as defined by Cooperative Extension Service or other qualified professional authorities	Do not apply more than 3 ounces product per acre per application and do not exceed 21 ounces product per season. Allow at least 7 days to elapse between final application and harvest.
	2.4 (0.13 lb. ai/acre)	For mid- to late-season applications and to heavier infestations and under conditions in which thorough coverage is more difficult. Under heavy infestations, continuous moth flights and/or egg masses and larvae in all stages of development, reapplication on a 10 to 14-day schedule will be required to protect new growth until moth flights and/or hits subside.	See Rotational Crop Restrictions in the body of this label.

*The Cole crop grouping (Brassica leafy vegetables) includes broccoli, Chinese broccoli, broccoli raab, Brussels sprouts, cabbage, bok choy, Napa cabbage, Chinese mustard cabbage, cauliflower, cavalo broccolo, collards, kale, kohlrabi, mizuna, mustard greens, mustard spinach, rape greens.

The Leafy Vegetables grouping includes amaranth, arugula, cardoon, celery, Chinese celery, celtuce, chervil, edible-leaved chrysanthemum, garland chrysanthemum, corn salad, garden cress, upland cress, dandelion, dock, endive, Florence fennel, lettuce, orach, parsley, garden purslane, winter purslane, radicchio, rhubarb, Spinach, New Zealand spinach, vine spinach, Swiss chard.

**CONFIRM 70 WSP Agricultural Insecticide is supplied in water-soluble pouches containing 7 ounces of 70% ai wetttable powder.

USE DIRECTIONS FOR CRANBERRY

GROUND APPLICATION: Make applications by conventional ground sprayers which are calibrated to deliver a minimum of 20 gallons per acre.

AERIAL APPLICATION: Make applications of CONFIRM 70WSP in a minimum of 10 gpa.

CHEMIGATION APPLICATION: For use only in solid-set sprinkler systems designed specifically for chemigation. Apply through a properly calibrated chemigation system that has the appropriate back flow prevention devices. See the 'MIXING' section of this labeling for specific mixing and dilution instructions. CONFIRM 70WSP should be applied in dedicated chemigation cycles only, not as a part of a regular irrigation cycle. Do not exceed 900 gallons of water per acre application volume. Minimum volume should be used for flush out to avoid diluting or rinsing off product. Washout time should not exceed six (6) minutes. Sprinkler heads should be set in a spacing not exceeding 50 feet by 60 feet and adjusted to provide 100% overlap. Crop injury, lack of effectiveness, or illegal pesticide residues can result from nonuniform distribution of treated water.

GENERAL PRECAUTIONS FOR APPLICATIONS THROUGH CHEMIGATION SYSTEMS

- Do not connect an irrigation system used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- Chemigation systems connected to public water systems must contain a functional reduced-pressure zone (RPZ), back flow preventer 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 system 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.
- Systems not connected to a public water supply must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located in the irrigation pipeline to prevent water source contamination from back flow.
- 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 pesticide distribution is adversely affected.
- 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 positive displacement, metering 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.
- If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

TARGET PESTS	APPLICATION RATE		APPLICATION TIMING	RESTRICTIONS
	Acres per pouch**	Ounces Product per acre		
Blackheaded fireworm	1.2	6.0 (0.26 lb. ai/acre)	<p>First generation: Apply at first sign of larval infestation and make a second application 7 to 10 days following the first application.</p> <p>Second generation: Make the first application at 10-20% egg hatch (typically 8 to 12 days following biofix*) followed by a second application 7 to 10 days later.</p>	<p>Do not apply more than 24 oz of CONFIRM 70WSP per season</p> <p>Allow at least 30 days to elapse between final application and harvest</p>
Spotted fireworm	1.2	6.0 (0.26 lb. ai/acre)	<p>First generation: Apply to small larvae before webbing occurs when threshold infestations are detected by sweep net sampling. Make a second application 7 to 10 days following the first application to heavy infestations or sustained moth flight.</p> <p>Second generation: Make the first application at 10-20% egg hatch (usually mid to late June) followed by a second application 7 to 10 days later.</p>	
Sparganothis fruitworm	1.2	6.0 (0.26 lb. ai/acre)	<p>First generation: Initiate applications as soon as larvae are detected by sweep net sampling. Make a second application in 7 to 14 days.</p> <p>Summer generation: Make the first application at 5-10% egg hatch (usually 10 to 14 days following biofix) followed by a second application 7 to 10 days later (about 60% egg hatch).</p>	
Cranberry fruitworm	1.2	6.0 (0.26 lb. ai/acre)	<p>Apply at initiation of egg laying (approximately 400 Day Degrees (DD) following biofix-base 50°). Make a second application at 100% petal fall (usually 7 to 14 days after the initial application). Additional applications at 10-14 day intervals may be required under high pressure or sustained moth flight.</p>	
Blossom worm False armyworm - Gypsy moth	1.2	6.0 (0.26 lb. ai/acre)	<p>Apply when larvae are in the 1st to 3rd instar and when action thresholds are reached based on local Extension Service recommendations.</p>	
Spanworms	1.2	6.0 (0.26 lb. ai/acre)	<p>Initiate applications when infestations reach threshold levels based on sweep net sampling. Additional applications at 10-14 day intervals may be required under high pressure or sustained moth flight.</p>	

*Biofix is defined as first sustained adult catch in pheromone traps, typically, 5 moths in 3 traps within a seven-day period.

**CONFIRM 70 WSP Agricultural Insecticide is supplied in water-soluble pouches containing 7 ounces of 70% ai wettable powder.

USE DIRECTIONS FOR FRUITING VEGETABLES*

Ground Application: Apply a minimum of 10 gallons per acre by conventional ground equipment to young crop and small plants. Apply a minimum of 20 gallons per acre to densely foliated or difficult-to-cover crops to ensure thorough coverage.

Aerial Application: Make applications of CONFIRM 70WSP in a minimum of 10 gallons per acre.

Spray Adjuvants: One pint of LATRON CS-7® Spray Adjuvant per 100 gallons of spray mixture or similar spreader-binder is recommended to maximize coverage and distribution of the spray material.

TARGET PESTS	APPLICATION RATE Acres per Pouch**	APPLICATION RATE Ounces per Acre	APPLICATION TIMING	RESTRICTIONS
Alfalfa looper Beet armyworm Black cutworm Cabbage looper European corn borer Fall armyworm Imported cabbageworm Southern armyworm Tobacco hornworm Tomato hornworm True armyworm Yellowstriped armyworm	2.5 to 3.5	2 to 3 (0.09 to 0.13 lb. ai/acre)	For early season applications only to young crop and small plants. Begin applications when first signs of feeding damage appear or when infestations reach threshold levels as defined by Cooperative Extension Service or other qualified professional authorities	Do not apply more than 6 ounces product per acre per application and do not exceed 24 ounces product per season. Allow at least 7 days to elapse between final application and harvest.
	1.2 to 2.4	3 to 6 (0.13 to 0.26 lb. ai/acre)	For mid- to late-season applications and to heavier infestations and under conditions in which thorough coverage is more difficult. Under heavy infestations, continuous moth flights and/or egg masses and larvae in all stages of development, reapplication on a 10 to 14-day schedule will be required to protect new growth until moth flights and/or hits subside.	See Rotational Crop Restrictions in the body of this label.

*The Fruiting vegetable grouping includes eggplant, ground cherry, pepino, pepper (bell, chili, cooking), pimento, tomatillo and tomato.

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USE DIRECTIONS FOR POME FRUITS

(Apples, Crabapples, Loquat, Mayhaw, Pears including oriental, Quince)

Ground Application: Make applications of CONFIRM 70 WSP Agricultural Insecticide by conventional ground sprayers which are calibrated to deliver a minimum of 50 gallons per acre to trellised trees or trees 10 feet tall or less. For trees greater than 10 feet tall, use a minimum of 100 gallons per acre. The use of a Spreader-Sticker such as LATRON B-1956 is recommended to maximize uniform coverage and distribution of the spray material

Aerial Application: Make applications of CONFIRM 70 WSP Agricultural Insecticide in a minimum of 20 gallons per acre. CONFIRM 70 WSP can be applied by aerial applications when situations warrant. However, this method should not be used if the size of the tree or density of the foliage prohibits thorough, uniform coverage of the entire tree canopy.

TARGET PESTS	APPLICATION RATE		APPLICATION TIMING	RESTRICTIONS
	Acres per pouch*	Ounces Product per acre		
Codling moth (East of the Rockies)	1.0	7.0 (0.31 lb. ai/acre)	For each codling moth generation, apply at initiation of egg hatch [150-250 Day Degrees (DD), base 50F, following biofix**] followed by a second application 10-15 days following the first application (usually 450-550 DD). Additional applications at 10-15 day intervals may be required under high infestations, sustained moth flight, or to ensure coverage of rapidly expanding fruits or foliage.	Do not apply more than 7 oz per acre per application or 42 oz of CONFIRM 70 WSP per acre per season. Allow at least 14 days to elapse between final application and harvest. Do not graze livestock in treated areas or feed cover crops grown in treated areas to livestock.
Codling moth (West of the Rockies) For use against low to moderate infestations in conjunction with alternate control measures such as in established Mating Disruption blocks.	1.0	7.0 (0.31 lb. ai/acre)	For each codling moth generation, apply at initiation of egg hatch [150-250 Day Degrees (DD), base 50F, following biofix**] followed by a second application 10-15 days following the first application (usually 450-550 DD). Additional applications at 10-15 day intervals may be required under high infestations, sustained moth flight, or to ensure coverage of rapidly expanding fruits or foliage.	
Obliquebanded leafroller (West of the Rockies)	1.0	7.0 (0.31 lb. ai/acre)	Spring (overwintering) generation: Make 1 to 2 applications during the pink to petal fall period depending on infestation level. Summer generation: Begin applications at early egg hatch (450-550 DD, base 43F, following biofix). Make a second application 7-14 days later (usually 650-850 DD). A third application 10-12 days after the second application may be required under high pressure, sustained moth flight or prolonged shoot growth.	

Obliquebanded leafroller	1.0	7.0 (0.31 lb. ai/acre)	<p>Spring (overwintering) generation: Make 1 to 2 applications during the pink to petal fall period depending on infestation level.</p> <p>Summer generation: Begin applications at peak moth flight (200-300 DD, base 43F, following biofix). Make a second application 7-14 days later (usually 500-600 DD).</p> <p>A third application 10-12 days after the second application (usually 800-900 DD) may be required under high pressure, sustained moth flight or prolonged shoot growth.</p> <p>Late season: Apply to late season larval infestations of overwintering generation to minimize damage to the fruit.</p>
Pandemis leafroller	1.0	7.0 (0.31 lb. ai/acre)	<p>Spring (overwintering) generation: Make 1 to 2 applications during the pink to petal fall period depending on infestation level.</p> <p>Summer generation: Begin applications at peak moth flight (300-400 DD, base 41F, following biofix). Make a second application 7-14 days later (usually 600-700 DD). Under heavy infestation a third application may be required 10-14 days after the second application.</p>
Tufted apple bud moth	1 to 1-3/4	4.0 - 7.0 (0.18 - 0.31 lb. ai/acre)	<p>First generation: Make application at 10-30% egg hatch (600-900 DD, base 45F, after biofix). A second application at 60-90% egg hatch may be required under heavy infestation levels.</p> <p>Second generation: Make the first application at 20-30% egg hatch (2300-2500 DD).</p> <p>A second application approximately 14 days later may be required under high pressures or sustained moth flight on late maturing varieties.</p>
Eyespotted bud moth Fruittree leafroller Redbanded leafroller Variegated leafroller	1.0	7.0 (0.31 lb. ai/acre)	<p>For control of other leafrollers, begin applications at early egg hatch for each generation. Make the first application before webbing and sheltering begins.</p> <p>Make a second application in 10-14 days to ensure complete coverage of rapidly expanding fruits or foliage.</p>
Lesser appleworm	1.0	7.0 (0.31 lb. ai/acre)	<p>For each generation, apply at initiation of egg hatch before larvae enter the fruit. Make a second application 10-14 days following the first to ensure complete coverage of rapidly expanding fruits or foliage or under conditions of high infestation or sustained moth flight.</p>
Green fruitworm	1.0	7.0 (0.31 lb. ai/acre)	<p>Apply at initiation of egg hatch or at the first sign of larval infestation. A second application may be required 10-14 days following the first application to ensure complete coverage of rapidly expanding fruits or foliage.</p>

*CONFIRM 70 WSP Agricultural Insecticide is supplied in water-soluble pouches containing 7 ounces of 70% ai wettable powder.

**Biofix is defined as first sustained adult catch in pheromone traps, typically, 5 moths in 3 traps within a seven-day period.

CONFIRM, LATRON B-1956 AND CS-7 ARE REGISTERED TRADEMARKS OF ROHM AND HAAS COMPANY

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M1b
5/5/99



SMART INSECTICIDE TECHNOLOGY

13/16

**SUPPLEMENTAL LABELING FOR USE OF
CONFIRM® 70 WSP AGRICULTURAL INSECTICIDE
IN POME FRUIT**

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUL 21 1999

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
707-258**

**EPA Reg. No 707-238
EPA EST. NO. 39578-TX-01**

DIRECTIONS FOR USE

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

This labeling must be in the possession of the user at the time of application.

NOTICE: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions on the container labeling. If the Conditions of Sale and Warranty are not acceptable, return the product unopened within thirty days of purchase to the place of purchase.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Under some conditions, this chemical may also have a high potential for runoff into surface water for several weeks or months after application. Do not cultivate within 10 feet of aquatic areas so as to allow growth of a vegetative filter strip. Drift from applications of this pesticide is likely to result in damage to sensitive aquatic invertebrates in water bodies adjacent to the treatment area. For terrestrial uses, do not apply directly to water or to areas where surface water is present or to inter-tidal areas below the mean high water mark, except under forest canopy when aerially applied to control forest pests. Do not contaminate water when disposing of equipment wash-waters and rinsate. Do not apply when weather conditions favor drift or runoff from areas treated. This pesticide demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

USE DIRECTIONS FOR POME FRUITS

(Apples, Crabapples, Loquat, Mayhaw, Pears including oriental, Quince)

Ground Application: Make applications of CONFIRM 70 WSP Agricultural Insecticide by conventional ground sprayers which are calibrated to deliver a minimum of 50 gallons per acre to trellised trees or trees 10 feet tall or less. For trees greater than 10 feet tall, use a minimum of 100 gallons per acre. The use of a Spreader-Sticker such as LATRON B-1956 is recommended to maximize uniform coverage and distribution of the spray material

Aerial Application: Make applications of CONFIRM 70 WSP Agricultural Insecticide in a minimum of 20 gallons per acre. CONFIRM 70 WSP can be applied by aerial applications when situations warrant. However, this method should not be used if the size of the tree or density of the foliage prohibits thorough, uniform coverage of the entire tree canopy.

TARGET PESTS	APPLICATION RATE		APPLICATION TIMING	RESTRICTIONS
	Acres per pouch*	Ounces Product per acre		
Codling moth (East of the Rockies)	1.0	7.0 (0.31 lb. ai/acre)	For each codling moth generation, apply at initiation of egg hatch [150-250 Day Degrees (DD), base 50F, following biofix**] followed by a second application 10-15 days following the first application (usually 450-550 DD). Additional applications at 10-15 day intervals may be required under high infestations, sustained moth flight, or to ensure coverage of rapidly expanding fruits or foliage.	Do not apply more than 7 oz per acre per application or 42 oz of CONFIRM 70 WSP per acre per season. Allow at least 14 days to elapse between final application and harvest.
Codling moth (West of the Rockies) For use against low to moderate infestations in conjunction with alternate control measures such as in established Mating Disruption blocks.	1.0	7.0 (0.31 lb. ai/acre)	For each codling moth generation, apply at initiation of egg hatch [150-250 Day Degrees (DD), base 50F, following biofix**] followed by a second application 10-15 days following the first application (usually 450-550 DD). Additional applications at 10-15 day intervals may be required under high infestations, sustained moth flight, or to ensure coverage of rapidly expanding fruits or foliage.	
Obliquebanded leafroller (West of the Rockies)	1.0	7.0 (0.31 lb. ai/acre)	Spring (overwintering) generation: Make 1 to 2 applications during the pink to petal fall period depending on infestation level. Summer generation: Begin applications at early egg hatch (450-550 DD, base 43F, following biofix). Make a second application 7-14 days later (usually 650-850 DD). A third application 10-12 days after the second application may be required under high pressure, sustained moth flight or prolonged shoot growth.	Do not graze livestock in treated areas or feed cover crops grown in treated areas to livestock.
Obliquebanded leafroller	1.0	7.0 (0.31 lb. ai/acre)	Spring (overwintering) generation: Make 1 to 2 applications during the pink to petal fall period depending on infestation level. Summer generation: Begin applications at peak moth flight (200-300 DD, base 43F, following biofix). Make a second application 7-14 days later (usually 500-600 DD). A third application 10-12 days after the second application (usually 800-900 DD) may be required under high pressure, sustained moth flight or p shoot growth. Fall overwintering generation: Apply to late season larval infestations of overwintering generation to minimize damage to the fruit.	

USE DIRECTIONS FOR POME FRUITS (CONTINUED)

TARGET PESTS	APPLICATION RATE		APPLICATION TIMING	RESTRICTIONS
	Acres per pouch*	Ounces Product per acre		
Pandemis leafroller	1.0	7.0 (0.31 lb. ai/acre)	<p>Spring (overwintering) generation: Make 1 to 2 applications during the pink to petal fall period depending on infestation level.</p> <p>Summer generation: Begin applications at peak moth flight (300-400 DD, base 41F, following biofix). Make a second application 7-14 days later (usually 600-700 DD). Under heavy infestation a third application may be required 10-14 days after the second application.</p>	
Tufted apple bud moth	1 to 1-3/4	4.0 - 7.0 (0.18 - 0.31 lb. ai/acre)	<p>First generation: Make application at 10-30% egg hatch (600-900 DD, base 45F, after biofix). A second application at 60-90% egg hatch may be required under heavy infestation levels.</p> <p>Second generation: Make the first application at 20-30% egg hatch (2300-2500 DD). A second application approximately 14 days later may be required under high pressures or sustained moth flight or late maturing varieties.</p>	
Eyespotted bud moth Fruittree leafroller Redbanded leafroller Variegated leafroller	1.0	7.0 (0.31 lb. ai/acre)	<p>For control of other leafrollers, begin applications at early egg hatch for each generation. Make the first application before webbing and sheltering begins. Make a second application in 10-14 days to ensure complete coverage of rapidly expanding fruits or foliage.</p>	
Lesser appleworm	1.0	7.0 (0.31 lb. ai/acre)	<p>For each generation, apply at initiation of egg hatch before larvae enter the fruit. Make a second application 10-14 days following the first to ensure complete coverage of rapidly expanding fruits or foliage or under conditions of high infestation or sustained moth flight.</p>	
Green fruitworm	1.0	7.0 (0.31 lb. ai/acre)	<p>Apply at initiation of egg hatch or at the first sign of larval infestation. A second application may be required 10-14 days following the first application to ensure complete coverage of rapidly expanding fruits or foliage.</p>	

*CONFIRM 70 WSP Agricultural Insecticide is supplied in water-soluble pouches containing 7 ounces of 70% ai wettable powder.

**Biofix is defined as first sustained adult catch in pheromone traps, typically, 5 moths in 3 traps within a seven-day period.

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CONDITIONS OF SALE AND WARRANTY

Rohm and Haas warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. **ROHM AND HAAS MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of Rohm and Haas and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pest, drift to other crops or property or failure to follow label directions will be assumed by the Buyer or User. **IN NO CASE WILL ROHM AND HAAS OR SELLER BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

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