FEB _ 4 1993

L. Vernon White Griffin Corporation P.O. Box 1947 Valdosta, GA 31603

Dear Mr. White:

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Subject: Amended Terms and Conditions of Registration and Amended

Labeling

Super Tin 4L

EPA Registration No. 1812-244 Duter in Water Soluble Bags EPA Registration No. 1812-275

Duter WP

EPA Registration No. 1812-276

Duter Flowable 30

EPA Registration No. 1812-277

Luper Tin 80WSP

Ere Registration No. 1812-350

Prc 3X

EPA Registration No. 1812-351

Your Submissions Dated January 12, 1993

This letter grants your request to amend the terms and conditions of the above-referenced product registrations as set forth in your letter of January 12, 1993.

The amended labeling for Super Tin 4L, EPA Registration No. 1812-244 and Pro-tex, EPA Registration No. 1812-351, referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. A skull and crossbones must appear in close proximity to the Signal Word DANGER on the front panel. POISON must appear in the color red.

b. According to PR Notice 82-1, the Tank Mix directions for SUPER SIX must include statements similar to the following:

This product can be mixed with _______ (chemical name, including percentage of active ingredient and type of formulation, or specific product name, or both) for use on ______ (Crops/sites) in accordance with the more (most) restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing.

c. In order to be consistent with Super Tin 4L, EPA Registration No. 1812-244, the label for Pro-tex, EPA Registration No. 1812-351, for Ground application to Sugar Beets and Potato must specify:

(Closed Cabs Only)

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- d. The instruction for chemigation must specify that posted signs remain in place for the duration of the restricted entry interval.
- e. Modify the reentry statements to read as follows:

Do not enter treated areas without appropriate protective clothin, equivalent to that worn by the applicator (see Label Precautionary Statement) for 24 hours after treatment.

- f. Proof read the label. In the reentry section there is a misplaced parenthesis.
- 2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

Griffin must submit label amendments for Duter WP, EPA Registration No. 1812-276 and Duter Flowable 30, EFA Registration No. 1812-277, reflecting the amended terms and conditions of registration or voluntarily cancel these registrations.

Griffin may not sell or distribute, except for the purpose of a recall, any TPTH end-use products after October 1, 1993, unless products are in water soluble packages or bear labeling requiring the use of mechanical transfer systems for all mixing and loading.

Failure to comply with any terms and conditions contained in the amended registration could result in issuance of a Notice of Intent to Cancel pursuant to the terms of the amended registration. A stamped copy of the label is enclosed for your records.

Sincerely yours,

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Cynthia Giles-Parker Product Manger (22) Fungicide Herbicide Branch Registration Division (47505C)

Enclosure

cc: Margaret Rice

Special Review Branch

Special Review and Reregistration Division (H7508W)

RESTRICTED USE PESTICIDE

Because of the high acute toxicity of triphe yltin hydroxide and its potential for affecting fetal development, this product may be applied only by certified applicators or persons directly under their supervision.

PRO-TEX™

Maneb (Manganese Ethylenebisdithiocarbamate)	32.63%
(Equivalent to manganese metallic 11.34%)	
Triphenyltin hydroxide	. 4.72%
Inert Ingredients	62.65%
Total	100.00%

THIS PRODUCT CONTAINS 3.5 LBS. OF MANEB PER GALLON AND 0.5 LBS. OF TPTH PER GALLON

KEEP OUT OF REACH OF CHILDREN DANGER - PELIGRO

ACCEPTED with COMMENTS
In EPA Letter Dated:

POISON STATEMENT OF PRACTICA. TREATMENT

the Federal Inrecticide tile, and Rodenticide Act anded, for the pesticide and under EPA Reg. No.

IF ON SKIN: Wash with plenty of soap and water.

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

IF IN EYES: Flush with plenty of water. Call a physicirn.

IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution or if these are not available, drive large quantities of water. Call a physician or Poison Control Center.

PRECAUCIONAL AL TISUAPIC. Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado ampliamente.

See Additional Precautionary Statements.

Griffin Corporation Valdosta, GA 31501

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New Contents 21/2 Gallons

EPA Reg. No. 1812-351 EPA Est. No. 1812-GA-3

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER - PELIGRO

DANGER: Fatal if inhaled. Corrosive, causes irreversible eye damage. May be harmful or fatal if swallowed or absorbed through the skin. Do not get in eyes, or on skin. Do not rub eyes or mouth with hands. Do not breathe vapor or spray mist. Keep all unprotected persons, children, livestock, and pets away from treated area or where there if danger of drift. Do not enter or allow entry into treated areas or areas where there is a danger of drift without appropriate protective clothing equivalent to that worn by the applicator (see Personal Protective Equipment) for 24 hours after treatment. Keep all unprotected persons, children, livestock, and pets away from treated area or where there if danger of drift.

PERSONAL PROTECTIVE EQUIPMENT: Handlers (Mixers, Loaders, Applicators) and Early Reentry Workers must wear the following protective clothing and equipment: cotton coveralls over a long sleeved shirt and long pants, chemical resistant gloves (including neoprene-coated, butyl rubber and nitrile rubber) hat, boots, socks, goggles or a face shield and a pesticide respirator jointly approved by the Mine Safety and Health Administration (MSHA - formerly the Mining Enforcement and Safety Administration) and the National Institute for Occupational Safety and Health. Goggles, face shield or safety glasses must be worn when applying this product not just when handling. When handling the concentrated product, wear a chemical resistant apron and a face shield.

During application from a completely enclosed cab with positive pressure filtration or an enclosed cockpit for aerial application a long-sleeved shirt and long pants may be worn in place of the above protective clothing. Chemical resistant gloves must be available in the cab or cockpit and worn while existing. The cab or cockpit must be equipped with a sealable container for glove storage to prevent contamination of the inside of the cab or cockpit.

The United States Environmental Protection Agency has determined that triphenyltin hydroxide, one of the active ingredients of this product, affects fetal development in laboratory animals. Exposure to this product during pregnancy should be avoided.

IMPORTANT! Before removing gloves, wash them with soap and water. Always wash hands, face and arms with soap and water before eating, smoking or drinking. Always wash hands and arms with soap and water before using the toilet.

After work take off all clothes and shoes. Shower using soap and water. Wear only clean clothes. Wear only clean clothes. Wash protective clothing and protective equipment with soap and water after each use. Personal clothing worn during use must be laundered separately from household

articles. Clothing and protective equipment drenched must be destroyed according to state and local regulations.

DRENCHED CLOTHING CANNOT BE ADEQUATELY DECONTAMINATED.

During aerial application, human flaggers are prohibited unless in totally enclosed vehicles.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water, to areas where surface water is present or to intertical areas below the mean high water mark. Cover or incorporate spills. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

RE-ENTRY STATEMENT

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

Do not enter treated areas or areas without proctective clothing equivalent to that worn by the applicator (see Personal Protective Equipment) for 24 hours after treatment.

Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Indicate specific oral warnings which inform workers of areas or fields that may not be entered without protective clothing equivalent to that worn by the applicator (see Personal Protective Equipment) for 24 hours after treatment and appropriate actions to take in case of accidental exposure). When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: DANGER. Area treated with TPTH and Maneb on (date of application). Do not enter treated areas without protective clothing equivalent to that worn by the applicator (see Personal Proctective Equipment) for 24 hours after treatment. In case of accidental exposure consult your nearest Poison Control Center.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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.

DIRECTIONS FOR USE AS A SPRAY

Pro-Tex Fungicide can be applied as a ground or aerial spray to control fungal infestations on listed crops. A mechanical transfer system is required for all mixing and/or loading of this product. A "mechanical transfer system" is defined as a mechanism capable of removing the pesticide from the shipping container and transferring the pesticide into mixing tanks and/or application equipment to prevent worker exposure to the pesticide. A closed system is required for aerial applications. The closed system for mixing and/or loading this product must be capable of removing the pesticide from the shipping container, rinsing the container and transferring the pesticide and rinsate into mixing tanks and/or application equipment. Application rates are for general use and must not be exceeded. The state agricultural extension or agricultural experiment station specialists should be consulted for specific applications and timing recommendations. With any spray application thorough coverage is essential for good control. Do not apply this product through any type of irrigation system except for use on potatoes. See chemigation information below.

During aerial application, human flaggers are prohibited unless in totally enclosed vehicles.

If this product is used on a crop, no other product containing a different EBDC active ingredient may be used on the same crop during the same growing season.

Apply this product only as specified on this label.

GENERAL CHEMIGATION INSTRUCTIONS

Apply this product only through one or more of the following types of systems: sprinkler including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move

irrigation system(s). Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

For specific information about calibration, contact State Extension Service specialists, equipment manufacturers or other irrigation experts.

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.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, day care centers, hospitals, inpatient clinics, nursing homes or any public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to the following requirements. Treated areas may not be reentered without protective clothing equilvalent to that worn by the applicator for 24 hours after treatment. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any location affording maximum visibility to sensitive areas. The printed side of the sign signal face away from the treated area towards the sensitive area. The signs shall be printed in English. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color which sharply contrasts with their immediate background. At the top of the sign shall be the words KEEP OUT, followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word STOP. Below the symbol shall be the words PESTICIDES IN IRRIGATION WATER.

SPRINKLER CHEMIGATION

The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

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 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.

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 metering pump, such as a positive displacement 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.

When mixing, fill nurse tank half full with water. Add PRO-TEX slowly to tank while hydraulic or mechanical agitation is operating and continue filling with water. Stickers, spreaders, insecticides, nutrients, etc. should be added last. If compatibility is in question, use the compatibility jar test before mixing a whole tank. Because of the wide variety of possible combinations which can be encountered, observe all cautions and limitations on the label of all products used in mixtures.

PRO-TEX should be added through a traveling irrigation system continuously or at the last 30 minutes of solid set or hand moved irrigation systems. Agitation is recommended.

GENERAL INSTRUCTIONS FOR APPLICATION

CROP	DISEASE	QTS/ACRE	USE INSTRUCTIONS
Potatoes	Early and Late Blight	0.75 - 1.5	GENERAL: Applications should begin with the appearance of blight weather conditions and continue on a seven (7) day schedule. The lower rate of application should be used early in the season and the high rate mid to late season or when blight infection is in the area. Do not apply within 21 days of

harvest. Do not exceed 6 QTS/A per growing season. It is recommended that this product be used with an INTEGRATED PEST MANAGEMENT PROGRAM. Vine kill should occur 14 days before harvest.

GROUND: Apply in at least 15 gallons of water. Full coverage of the foliage is necessary for the best results. Diluted spray should be directed uniformly to all parts of the plant and the gallonage increased according to the size of the plants.

AERIAL: Apply in 3-10 gallons of water. For helicopter application fly high enough so as not to whip the vines.

Sugar Beets Cercospora 1.0 - 1.8 Leafspot GENERAL: Use the lower gallonage when plants are small and increase volume with plant size. Use the lower rate for protective sprays and the higher rates later in the season or during high infection periods. Application should begin when leafspot conditions appear or when the disease is in the area. Repeat at 10-14 day intervals. Do not treat within 21 days of harvest. Do not exceed 6 QTS/A per growing season. Do not graze or feed treated beet tops to livestock.

GROUND: Apply in at least 15 gallons of water. Full coverage of the plant is necessary for best results.

AERIAL (helicopter or fixed wing aircraft): Apply in 5-10 gallons of water.

WARRANTY STATEMENT

GRIFFIN warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with 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 applications, all of which are beyond the control of GRIFFIN. In no case shall GRIFFIN be liable of consequential, special or indirect damages resulting from the use or handling of this product. Al such risks shall be assumed by the Buyer. GRIFFIN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.