



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

FEB 17 2000

Judy Smith
Griffin L.L.C.
P.O. Box 1847
2509 Rocky Ford Road
Valdosta, Georgia 31603-1847

Dear Ms. Smith:

Subject: PRO-TEX
EPA Registration No. 1812-351
Re: Label amendments as part of TPTH RED Settlement agreement
Your Submission dated January 11, 2000

The revised label for the product referred to above, submitted, in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable under the following conditions:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. The Restricted Use Statement must be revised to **RESTRICTED USE PESTICIDE** Because of the high acute toxicity of triphenyltin hydroxide and its potential for affecting fetal development. For retail sale to and use by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicators certification. Since expedited review of this submission was requested for the purpose of prompt printing of labels, any labeling printed as a result of this action which bears the Restricted Use statement, must be revised as indicated above.

- b. Revise the following PPE statement for handlers using engineering controls to read "Handlers, mixers, loaders, applicators, flaggers and other using engineering controls must wear." Also add chemical resistant apron to the list of protective equipment.
 - c. On page 4, move the Agricultural Use Requirements box to the required location under the Directions for Use section and before the Storage and Disposal section.
 - d. Since chemigation instructions applies to potatoes only, add statement similar to that on other products labels that these instructions only apply to potatoes. Also, the last statement in this section should be moved to the Use Directions section for potatoes.
 - e. Under the Use Directions for potatoes, add the Massachusetts to the list of states.
2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

cc: Nancy Zahedi
Special Review & Reregistration
Division (7508C)

RESTRICTED USE PESTICIDE

Because of the high acute toxicity of triphenyltin 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®

Active Ingredients:

Maneb (Manganese Ethylenebisdithiocarbamate)	32.63%
(Equivalent to manganese metallic 6.75%)	
Triphenyltin hydroxide	4.72%
Inert Ingredients	<u>62.65%</u>
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:
FEB 17 2000**



note: skull &
crossbones on
red background

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

1812-351

POISON

STATEMENT OF PRACTICAL TREATMENT

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand this label, find someone to explain it to you in detail).

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

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

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

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

For Medical Emergencies involving this product, call toll free 1-888-324-7598.

See label for additional precautions and directions for use.

Griffin L.L.C.
Valdosta, GA 31601

Net Contents 2½ Gallons

EPA Reg. No. 1812-351
EPA Est. No. _____

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

DANGER - PELIGRO

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.

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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are butyl rubber, nitrile rubber, or neoprene rubber. If you want more options, follow the instructions for Category A on an EPA chemical-resistant category selection chart.

Handlers exposed to the concentrate or diluted product must wear:

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant footwear plus socks
- Chemical-resistant gloves, such as butyl rubber, nitrile rubber, or neoprene rubber
- Protective eyewear
- Chemical-resistant apron for mixing, loading, or equipment maintenance
- Chemical-resistant headgear for overhead exposure
- Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C) or a NIOSH approved respirator with any N, R, P or HE filter.

Handlers using engineering controls must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves, such as butyl rubber, nitrile rubber, or neoprene rubber, during mixing and loading

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering controls statements:

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.

Applicators and human flaggers must be in enclosed cabs.

Aerial and Chemigation Applications: Mixers and loaders supporting aerial and chemigation applications must use a closed mixing and loading system that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)] for providing both dermal and inhalation protection. The system must include a mechanism for removing the pesticide from the shipping container, rinsing the container, and transferring the pesticide and rinsate into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage to not more than 2 ml. per disconnect point.

Ground Applications: Mixers and loaders supporting ground applications must use a mechanical transfer system that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)] for providing dermal protection. The system must include a mechanism for removing the pesticide from the shipping container, rinsing the container, and transferring the pesticide and rinsate into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage to not more than 2 ml. per disconnect point.

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.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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 allow this product to drift from the target site. Do not apply with aircraft within 300 feet or with groundboom equipment within 100 feet of any natural body of water such as rivers, streams, ponds, lakes and reservoirs. Do not apply with aircraft when wind speed is greater than 10 mph. Apply this pesticide only as specified on this label. Do not contaminate water when disposing of equipment washwaters.

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 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 intervals. 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 48 hours for all crops.

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 over long-sleeved shirt and long pants
- Chemical-resistant gloves, such as butyl rubber, nitrile rubber, or neoprene rubber
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

DIRECTIONS FOR USE

RESTRICTED USE PESTICIDE

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 response for pesticide regulation.

STORAGE AND DISPOSAL

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

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.

APPLICATION DIRECTIONS

GROUND AND AERIAL APPLICATION: Pro-Tex Fungicide can be applied as a ground or aerial spray to control fungal infestations on listed crops. 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.

Do not allow this product to drift from the target site. Apply this product only as specified on this label. In case of accidental exposure, see Statement of Practical Treatment.

AERIAL SPRAY DRIFT MANAGEMENT

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 and grower are 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.

1. The distance of the outermost 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 airstream and never be pointed downward 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 (below)**.

Aerial Drift Reduction Advisory Information:

This section is advisory in nature and does not supersede the mandatory label requirements.

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 reduces drift potential, but will not prevent drift if applications are made improperly or under unfavorable 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 flow rates 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 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 potential.

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 top of 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 crosswind, the swath will be displaced downward. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller crops, etc.).

WIND: Drift potential is lowest between wind speeds of 2 to 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 spray 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 both 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 and light to no wind. They begin to form at the sunsets 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 lateral in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS: This 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).

MAXIMUM SEASONAL POUNDAGE WHEN USED IN CONJUNCTION WITH ONE OR MORE EBDC PRODUCTS.

FOLIAR APPLICATIONS

Where EBDC Products Used Allow the Same Maximum Poundage of Active Ingredient Per Acre Per Season

If more than one product containing an EBDC active ingredient (maneb, mancozeb, or metiram) is used on a crop during the same growing season and the EBDC products used allow the same maximum poundage of active ingredient per acre per season, then the total poundage of all such EBDC products used must not exceed any one of the specified individual EBDC product maximum seasonal poundage of active ingredient allowed per acre.

Where EBDC Products Used Allow Different Maximum Poundage of Active Ingredients Per Acre Per Season

If more than one product containing an EBDC active ingredient is used on a crop during the same growing season and the EBDC products used allow different maximum poundage of active ingredients per acre per season, then the total poundage of all such EBDC products used must not exceed the lowest specified individual EBDC product maximum seasonal poundage of active ingredient allowed per acre.

SEED TREATMENT

In addition to the maximum number of foliar applications permitted by the formula stated above, a single application of seed treatment may be made on crops which have registered seed treatment uses.

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, in-patient 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 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 should face away from the treated area towards the sensitive area. The signs shall be printed in English. Signs must be posted prior to application. Signs must remain posted for the duration of the restricted entry interval. Signs must be composed of materials that prevent deterioration and maintain legibility across the restricted entry interval and the duration of posting.

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. This sign is in addition to any sign posted to comply with the Worker Protection Standard.

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.

PRECAUTIONS

We do not recommend mixtures with surfactants, spreaders, stickers or buffers unless testing or prior experience has shown the mixture to be non-phytotoxic to the crop. Combinations with some pesticides, micro-nutrients, spreaders, stickers, surfactants or buffering agents can increase phytotoxicity. Phototoxicity may be severe. Emulsifiable concentrate insecticides can be especially injurious in combination. Do not graze dairy or meat animals in treated areas.

GENERAL INSTRUCTIONS FOR APPLICATION

CROP	DISEASE	QTS/ACRE	USE INSTRUCTIONS
Potatoes	Early Blight, Late Blight	0.75 - 1.5	<p>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 7 days of harvest in the following states: CT, DE, FL, ME, MI, NH, NY, OH, PA, RI, VT, and WI. In all other states, do not apply within 14 days of harvest. Do not exceed 4.5 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.</p> <p>GROUND: (Enclosed Cabs Only) 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.</p> <p>AERIAL: Apply in 3 to 10 gallons of water. For helicopter application fly high enough so as not to whip the vines.</p>
Sugar Beets	Cercospora Leafspot	1.0 - 1.8	<p>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.</p>

Application should begin when leafspot conditions appear or when the disease is in the area. Repeat at 10 to 14 day intervals. Do not treat within 21 days of harvest. For the states of **MI, MN, and ND**, do not exceed 6 QTS/A per growing season. For all states **EXCEPT MI, MN, and ND**, do not exceed 4 QTS/AC per growing season. Do not graze or feed treated beet tops to livestock.

GROUND: (Enclosed Cabs Only) 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 to 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. All such risks shall be assumed by the Buyer. The exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall not exceed the purchase price paid for this product or at GRIFFIN'S election, the replacement of this product. GRIFFIN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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