

1812-395

2-17-2000

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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: Orbit 45WP Agpak/Super Tin 80WP Agpak Fungicide
EPA Registration No. 1812-395
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 statements 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. Revise last statement under Engineering Controls statements section to read Applicators and human flaggers must be in enclosed cabs.
 - d. Under Pecans, revise the use directions to clarify that the treatment rates are (6 treatments per acre and 9 treatments per acre).
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)

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Co-packaged Orbit™ 45WP and SuperTin® 80WP AGPAKs: PRODUCT LABEL

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.

**Orbit™ 45WP AGPAK® / Super Tin® 80WP AGPAK®
FUNGICIDE**

A co-pack containing propiconazole and triphenyltin hydroxide for control of certain diseases of pecans.

Orbit 45WP AGPAK

Active Ingredient: Propiconazole: 1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]Methyl]-1H-1,2,4-triazole	45%
Inert Ingredients	55%
Total:	100%

Contains 9 oz. propiconazole per 20 oz. water soluble pack

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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).

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF IN EYES: Hold eyelids open and flush eyes with a steady, gentle stream of water. Get medical attention if irritation persists.

IF SWALLOWED: Immediately call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: If ingested, induce emesis or lavage stomach. Treat symptomatically. For medical emergencies involving this product, call toll free 1-888-324-7598.

EPA Reg. No. 1812-395

20 oz.

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SuperTin 80WP AGPAK

Active Ingredient: Triphenyltin hydroxide	80%
Inert Ingredients	<u>20%</u>
Total:	100%

Contains 20 oz. triphenyltin hydroxide per 25 oz. water soluble pack

KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO
POISON



(Skull on Red background)

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).

STATEMENT OF PRACTICAL TREATMENT

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

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

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

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. Avoid alcohol.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.
For medical emergencies involving this product, call toll free 1-888-324-7598.

EPA Reg. No. 1812-350

25 oz.

GRIFFIN L.L.C.
Valdosta, Georgia 31601

Net Contents: 45 oz.

EPA Est. No. _____

PRECAUTIONARY STATEMENTS

Orbit 45WP AGPAK

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Causes eye irritation. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing.

SuperTin 80WP AGPAK

HAZARDS TO HUMANS & DOMESTIC ANIMALS

DANGER - PELIGRO

Fatal if inhaled. Corrosive, causes irreversible eye damage and skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust, vapor, or spray mist.

The United States Environmental Protection Agency has determined that triphenyltin hydroxide, the active ingredient of SuperTin 80WP, 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.

Applicators and other 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 and loading or equipment maintenance

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- 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 for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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.

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.

Ground-equipment applicators and flaggers must be in enclosed cabs.

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 cleaning equipment or disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill, or store near heat or open flame.

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.

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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
- Shoes 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.

STORAGE AND DISPOSAL

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

CONTAINER DISPOSAL: Completely empty outer bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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.

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APPLICATION DIRECTIONS

General Information

This product is a co-pack of two fungicides which provide broad spectrum control of certain diseases in pecans. The product consists of two water soluble packages which must be used together. Do not use separately.

Important: Do not use in nurseries, on landscape plantings, or as a tree injection.

FAILURE TO FOLLOW DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR DISEASE CONTROL, OR ILLEGAL RESIDUES.

GROUND AND AERIAL APPLICATION: This product 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 specialist should be consulted for specific application and timing recommendations. Apply this product only as specified on this label.

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 $\frac{3}{4}$ 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)**.

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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).

Spray Equipment

Thorough coverage is necessary to provide good disease control.

To avoid spray drift, do not apply when conditions favor drift beyond the target area. Avoid spray overlap, as crop injury may occur.

Equip sprayers with nozzles that provide accurate and uniform application. Be certain that nozzles are the same size and uniformly spaced across the boom. Calibrate sprayer before use. Use a pump with capacity to: (1) maintain a minimum of 35 psi at nozzles, and (2) provide sufficient agitation in tank to keep mixture in suspension - this requires recirculation of 10% of tank volume per minute. Use a jet agitator or liquid sparge tube for agitation. Do not air sparge.

Use screens to protect the pump and to prevent nozzles from clogging. Screens placed on suction side of pump should be **16-mesh or coarser**. Do not place a screen in the recirculation line. Use 50-mesh or coarser screens between the pump and boom, and where required, at the nozzles. Check nozzle manufacturer's recommendations.

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For more information on spray equipment and calibration, consult sprayer manufacturers and state recommendations. For specific local directions and spray schedules, consult the current state agricultural experiment station recommendations.

Mixing Procedures

Prepare no more spray than is needed for the immediate operation. Thoroughly clean spray equipment before using this product. Vigorous agitation is necessary to maintain uniformity of the spray mixture. Maintain maximum agitation throughout the spraying operation. **Do not let the spray mixture stand overnight in the spray tank. Flush the spray equipment thoroughly following each use and apply the rinsate to a previously treated area.**

When using co-packaged Super Tin 80WP and Orbit™ 45 WP AGPAKs alone, open outer bag(s) and place both unopened water soluble packs from each outer bag into the filled spray tank and close tank immediately. **Do not open water soluble packs.**

Tank Mixtures

When using this product with other tank mix partners, observe all directions for use, use rates, dilutions ratios, precautions, and limitations which appear on the tank mix product labels. No dosage rate should be exceeded and the most restrictive label precautions and limitations should be followed. This product should not be mixed with any product which prohibits such mixing. Tank mixtures or other applications of products referenced on this label are permitted only in those states in which the referenced products are registered.

If boron or other micronutrients, fertilizers or other crop protection chemicals are to be used, fill spray tank $\frac{2}{3}$ full, with agitation running add the Super Tin 80WP and Orbit 45 WP AGPAKs and close lid. **Do not open water soluble packs.** Allow approximately 10 minutes for the water soluble packages to dissolve. After packages have dissolved, add other products and remaining water. Continue agitation during sprayout. See PRECAUTIONS below before mixing with any other product.

Aerial Application

Avoid application under conditions where uniform coverage cannot be obtained or where excessive spray drift may occur. Do not apply directly to humans or animals.

Chemigation

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

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PRECAUTIONS

Do not graze livestock in treated areas or cut treated cover crops for feed.

Do not mix Orbit 45WP AGPAK with Cyprex®, or crop injury may occur.

We do not recommend mixture 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. **Phytotoxicity may be severe.** Emulsifiable concentrate insecticides can be especially injurious in combination.

Water soluble bags must be completely dissolved and dispersed in plain water before any other tank mix partners, including micronutrients or other liquid or dry fertilizers, are added to the spray solution. Boron, especially in the form of a micronutrient additive, such as Solubor®, etc., or as a natural component of the mix water, may prevent water soluble bags from dissolving.

ENDANGERED SPECIES RESTRICTIONS

The use of any pesticide in a manner that may kill or otherwise harm an endangered or threatened species, or adversely modify their habitat, is a violation of federal laws. The use of this product in pecans is controlled to prevent death or harm to endangered species. Do not use this product in the following counties:

<u>State</u>	<u>Counties</u>		
Alabama	Colbert Greene Jackson Lamar	Lauderdale Limestone Madison Marshall	Morgan Pickens Sumter
Arkansas	Clark Clay Cross	Dallas Hot Springs Randolph	Sharp St. Francis
Kentucky	Ballard Butler Green	Hart Livingston McCracken	Taylor Warren

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Tennessee	Bedford Decatur Hardin	Lincoln Marshall Maury	Perry Sequatchie
Missouri	Gasconade Jefferson Miller	Osage Ripley St. Louis	Wayne
Mississippi	Lowndes	Monroe	Noxubee

GENERAL INSTRUCTIONS FOR APPLICATION
of co-packaged SuperTin 80WP and Orbit 45WP AGPAKs

CROP	DISEASE	ACRES/ AGPAK	USE DIRECTIONS
Pecan (bearing or non- bearing)	Scab, Brown	5 acres / 25	Ground (Enclosed Cabs Only): Apply in sufficient water to provide for full coverage.
	Leafspot, Downy	oz. SuperTin	
	Spot, Powdery	80WP	Aerial: Apply in a minimum of 20 gallons of water. Diluted spray should be directed to all parts of the tree. Application should begin at pre-pollination stages when the young leaves are unfolding, and a second application made when the small nuts are forming. For those pecans grown in areas WEST of Interstate 35, apply a maximum of 6 treatments (30 oz. of Super Tin 80WP) during a single growing season at 2-4 week intervals as needed to maintain control. For those pecans grown EAST of Interstate 35, apply a maximum of 9 treatments (45 oz. of Super Tin 80WP) during a single growing season at 2-4 week intervals as needed to maintain control.
	Mildew, Liver	AGPAK + 20	
	Spot, Sooty	oz. Orbit	
	Mold, Leaf	45WP	
	Blotch, Vein	AGPAK	
	Spot, Zonate Leaf		
	Spot, Fungal Leaf		
	Scorch		

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Do not apply within 30 days of harvest.

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 application, all of which are beyond the control of GRIFFIN. In no case shall GRIFFIN be liable for 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 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 A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

AGPAK® and SuperTin® are trademark of Griffin Corporation.

Cyprex® is a trademark of American Cyanamid

Orbit™ is a trademark of Ciba-Geigy Corporation.

Solubor® is a trademark of United States Borax and Chemical Corporation.

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

FEB 17 2000

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

1812-395