

2935-427

7-11-2002

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JUL 11 2002

Ms. Linda D. Pearce
Wilbur-Ellis Company
P.O. Box 1286
Fresno, California 93715

Subject: Apron TL
EPA Reg. No.: 2935-⁴²⁷247
Submission dated May 24, 2002

Dear Ms. Pearce:

The labeling referenced to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided you make the labeling change indicated below before you release the product for shipment bearing the amended labeling:

- 1) Add the ground water advisory statement to the "Environmental Hazards" section of the "master label": "This chemical is known to leach through soil into groundwater under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contaminations."

In addition, the "Alternate Formulation CSF" dated 5/6/02 is acceptable and will be added to the products's file. If you have questions about this label review, please contact Dennis McNeilly at (703) 308-6742 or electronically at mcneilly.dennis@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mary L. Waller".

Mary L. Waller
Product Manager 21
Fungicide Branch
Registration Division (7505C)



APRON FLOWABLE

SEED TREATMENT FUNGICIDE
A seed treatment chemical for control of seed rot and damping-off diseases of certain crops.

FOR USE BY COMMERCIAL SEED TREATERS

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 11 2002
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2935-427

ACTIVE INGREDIENT:	
Metalaxyl-N-(2,6-dimethylphenyl)-N-(methoxyacetyl) alanine methyl ester	28.35%
OTHER INGREDIENTS	71.65%
TOTAL	100.00%
Contains 2.65 pounds Metalaxyl per gallon.	

EPA Reg. No. 2935-427

EPA Est. No. 2935-CA-01

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

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

IF SWALLOWED:	<ul style="list-style-type: none"> -Call a poison control center or doctor immediately for treatment advice. -Have person sip a glass of water if able to swallow. -Do not induce vomiting unless told to do so by a poison control center or doctor. -Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> -Take off contaminated clothing. -Rinse skin immediately with plenty of water for 15-20 minutes. -Call a poison control center or doctor for treatment advice.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if Swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater.

NOTE: WILBUR-ELLIS APRON FLOWABLE is a systemic fungicide having a specific mode of action. WILBUR-ELLIS APRON FLOWABLE could be subject to development of resistant strains of fungi. Development of resistance cannot be predicted. Therefore, WILBUR-ELLIS cannot assume liability for crop damage resulting from resistant strains of fungi. Consult your State Agricultural Experiment Station or Extension Service specialist for guidance and ways to control any possible WILBUR-ELLIS APRON FLOWABLE resistant strains of fungi which may occur.

DIRECTIONS FOR USE

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

Not for use on agricultural establishments in hopper-box, planter box, slurry box or other seed treatment application at or immediately before planting.

ALWAYS READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH ALL APPLICABLE STATE AND FEDERAL REGULATIONS.

IMPORTANT: READ THE ENTIRE DIRECTIONS FOR USE AND THE CONDITIONS OF SALE AND WARRANTY BEFORE USING THIS PRODUCT.

FAILURE TO FOLLOW DIRECTIONS ON THIS LABEL MAY RESULT IN CROP INJURY OR POOR DISEASE CONTROL.

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

WILBUR-ELLIS APRON FLOWABLE may be applied as a water-based slurry with other registered seed treatment insecticides and fungicides through standard slurry or mist-type commercial seed treatment equipment.

WILBUR-ELLIS APRON FLOWABLE is a systemic fungicide seed dressing specifically for control of *Pythium* and *Phytophthora* spp.

Federal law requires that bags containing treated seed shall be labeled with the following information: This seed has been treated with metalaxyl fungicide. Do not use for feed, food or oil purposes. Store away from feed and foodstuffs.

Note: Do not use seed for spinach destined to be grown in the greenhouse.

Always use WILBUR-ELLIS APRON FLOWABLE with an EPA-approved dye or colorant that imparts an unnatural color to the seed.

SEED TREATMENT - DOMESTIC USE

Carrots: For *Pythium* damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

COTTON: For *Pythium* seed rot and damping-off, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment to machine-delinted or acid-delinted cottonseed at the rate of 0.82-1.64 fl. oz. per 100 pounds of seed.

FORAGE GRASSES (All except scarified Bermuda): Grasses grown for hay, grazing or silage, corn (fodder or silage) and small grains grown for hay, grazing or silage.

For *Pythium* damping-off control apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82-1.64 fl. oz. per 100 pounds of seed.

FORAGE LEGUMES: Alfalfa, clover, lespedeza, beans (for forage), soybeans (for forage), soybean hay, peas (for forage), pea vine hay, cowpeas (for forage), cowpea hay, trefoil, vetch and velvet beans (for forage).

For *Pythium* damping-off and early season *Phytophthora* control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

For the suppression of early season downy mildew in alfalfa and soybeans: Apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

GARDEN BEETS: For control of *Pythium* damping-off, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 1.64 fl. oz. per 100 pounds of seed.

GRAIN CROPS: Wheat, barley, rye, oats, millet, rice, corn (field corn, sweet corn, and popcorn), buckwheat and triticale. For *Pythium* damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82-1.64 fl. oz. per 100 pounds of seed.

For control of systemic downy mildew of sweet corn, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 3.30 fl. oz. per 100 pounds of seed.

For *Pythium* damping-off control in wheat, barley, rye, oats and triticale in combination with Dividend, apply WILBUR-ELLIS

APRON FLOWABLE as a seed treatment at the rate of 0.11 fl. oz. per 100 pounds of seed.

For Pythium seed rot and damping-off in rice when applied in combination with Thiram products at labeled rates, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.11 fl. oz. per 100 pounds of seed.

NOTE: If using Apron treated rice seed, do not use Ridomil or products containing mefenoxam for control of Pythium in water-seeded rice.

FIELD CORN: To aid in the control of Seed Decay and Damping-off caused by Pythium. Apply as a commercial seed treatment at the rate of 0.11 fl. oz. per 100 pounds of seed. Apply only in combination with EPA-registered rates of WILBUR-ELLIS Captan products.

PEANUTS: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

SEED AND POD VEGETABLES: Black-eyed peas, cowpeas dill, edible soybeans, field beans, chick peas (garbanzo beans), field peas, garden peas, green beans, kidney beans, lima beans, navy beans, okra, peas, pole beans, snap beans, string beans, wax beans, lentils and lupines.

For Pythium damping-off and early season Phytophthora control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82-1.64 fl. oz. per 100 pounds of seed.

For control of Pythium damping-off and systemic downy mildew of peas, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 3.80 fl. oz. per 100 pounds of seed.

For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82-1.64 fl. oz. per 100 pounds of seed.

For Pythium damping-off control in field beans, kidney beans, navy beans, pinto beans and lentils, when less disease pressure is expected, use WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.11-0.41 fl. oz. per 100 pounds of seed in combination with WILBUR-ELLIS Captan or another registered seed treatment product.

SORGHUM: For control of Pythium damping-off on all sorghum cultivars, use 1.64 fl. oz. per 100 pounds of seed applied as a seed treatment.

For Pythium damping-off control when less disease pressure is expected, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.11 - 0.41 fl. oz. per 100 pounds of seed in combination with WILBUR-ELLIS Captan products at labeled rates.

For control of systemic downy mildew, apply 1.64 fl. oz. of WILBUR-ELLIS APRON FLOWABLE per 100 pounds of seed on cultivars which possess sorghum downy mildew resistance.

To those cultivars which do not possess resistance to a particular race of sorghum downy mildew in heavily infected areas with recent severe history, apply 3.3 fl. oz. of WILBUR-ELLIS APRON FLOWABLE per 100 pounds of seed as a seed treatment.

Seed treated with the 3.3 fl. oz. rate should be planted and not carried over to the following year. Only high quality sorghum seed (90% germ and above) should be treated with WILBUR-ELLIS APRON FLOWABLE.

SOYBEANS: For Pythium damping-off and early season Phytophthora control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82-1.64 fl. oz. per 100 pounds of seed.

For Pythium damping-off control when less disease is expected, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.11-0.41 fl. oz. per 100 pounds of seed in combination with WILBUR-ELLIS Captan or another registered seed treatment product.

SPINACH: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

Do not apply to spinach which is to be grown in greenhouses. Containers or bags containing Apron treated seed **must** be labeled with the restriction, "Do not use spinach seed for greenhouse planting".

SUGAR BEETS: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 1.64 fl. oz. per 100 pounds of seed.

SUNFLOWER: For control of systemic downy mildew, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 3.30 fl. oz. per 100 pounds of seed.

TURF GRASSES (All except scarified Bermuda): For Pythium damping-off control on golf courses, home lawns, reclamation and erosion control projects, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 1.56 - 3.12 fl. oz. per 100 pounds of seed.

SEED TREATMENT -- EXPORT USE

Seed treated in accordance with the export use pattern must be labeled as follows: For Export Only, Not for Domestic Sale or Use.

NOTE: Federal law requires that bags containing treated seeds shall be labeled with the following information: "This seed has been treated with metalaxyl fungicide. Do not use for feed, food, or oil purposes. Store away from feeds and foodstuffs." Use with an EPA-approved dye or colorant that imparts an unnatural color to the seed. Note: Do not use seed for spinach destined to be grown in the greenhouse.

BRASSICA (COLE) LEAFY VEGETABLES: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

CORN: For control of Pythium damping-off of corn, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

For systemic downy mildew control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 5.70 fl. oz. per 100 pounds of seed.

CUCURBITS: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

FRUITING VEGETABLES: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

LEAFY VEGETABLES: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

NOTE: Do not apply to spinach which is destined to be grown in the greenhouse.

MILLET: For control of Pythium damping-off of millet, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

For systemic downy mildew control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 7.22 fl. oz. per 100 pounds of seed.

ONIONS: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

PEAS: For Pythium damping-off and early season Phytophthora control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 1.64 fl. oz. per 100 pounds of seed.

For downy mildew control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 3.80 fl. oz. per 100 pounds of seed.

ROOT AND TUBER VEGETABLES: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

NOTE: Do not apply WILBUR-ELLIS APRON FLOWABLE to potatoes.

SORGHUM: For Pythium damping-off control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 0.82 - 1.64 fl. oz. per 100 pounds of seed.

For systemic downy mildew control, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 5.70 fl. oz. per 100 pounds of seed.

SUNFLOWER: For control of systemic downy mildew, apply WILBUR-ELLIS APRON FLOWABLE as a seed treatment at the rate of 6.00 - 10.00 fl. oz. per 100 pounds of seed.

STORAGE AND DISPOSAL

1. **Prohibitions:** Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.
2. **Storage:** Do not use or store near heat or open flame.
3. **Pesticide Disposal:** Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, State or local authorities.
4. **Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by incinerating. If allowed by State and local authorities.
5. **General:** Consult Federal, State, or local disposal authorities for approved alternative procedures such as limited open burning.

**NOTICE - READ CAREFULLY
CONDITIONS OF SALE AND LIMITED WARRANTY STATEMENT**

The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILBUR-ELLIS Company does not make, nor does it authorize any agent or representative to make, any warranty, guaranty or representation, expressed or implied, concerning this material or the use thereof, except in conformity with the statements on the label.

Neither WILBUR-ELLIS Company nor the seller shall be held responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on these conditions.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, except for the purposes of curative control of existing diseases or insect pests, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Wilbur-Ellis, no claims are made to guarantee germination of carry-over seed.

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**In Case of Emergency,
Call CHEMTREC: (800) 424-9300**

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