DEC 1 8 1991

Amvac Chemical Corporation c/o H.R. McLane H.R. McLane, Inc. 7210 Red Road, Suite 206 Miami, Florida 33143-5321

Dear Mr. McLane:

Subject: Amended Labeling

PCNB 2-E Liquid

EPA Registration No. 5481-212

Your Submissions Dated November 15, 1991 and

November 25, 1991

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide Rodenticide Act, as amended, is acceptable with the following comments:

- 1. Under the Environmental Hazards section, in the next to the last sentence, delete "or wetlands" on the label and in the supplemental labeling.
- Delete the section titled "Directions for Use" following the list of crops and diseases in the supplemental labeling. This paragraph already appears on the label preceding the Storage and Disposal section.
- 3. Under "How to Apply" in the supplemental labeling, delete the word "actual".

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

Sincerely yours,

Susan T. Lewis Product Manager (21) Fungicide-Herbicide Branch Registration Division (H7505C)

Englagura			CONCURRENCES				
SYMBOL	H7505C:		:jf:12/17	/91			
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EBA E 1220.1 M3 701							

*U.S.GPO:1989-624-485/10186

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BEANS (Continued)

SNAP & DRY BEANS: For White Mold caused by Sclerotine sclerotiorum apply AS A BAND ROW TREATMENT in an 8 Inch wide band centered on the row immediately after or at the time of planting by using 1 gallon mixed in 8 to 10 gallons of water to treat 14,500 linear feet of row for BUSH BEANS or 8,340 kinear feet for POLE BEANS. Avoid application directly to seed since delayed emergence may occur. When Diritro type pre-emergence herbicides are used, add 1 gallon of this product to the final spray mix of the herbicide and apply simultaneously. If disease is severe additional applications may be made at 2 to 3 week intervals using 1 or 2 nozzles per row and directing the spray to the soil at the base of the plants. Apply at the same rate using 1 gallon in 8 to 10 gallons of water to treat 14,500 linear feet of two. Do not apply after the first blooms appear. Do not feed treated vines to livestock.

GARLIC

For White Rot caused by Sclerotium cepivorum. AS A FURROW TREATMENT use 10 gallons of this product mixed in 100 gallons of water and apply at planting ne to 21,800 linear row feet per acre when crop row spacing is 24 inches. This it is equivalent to 58.7 oz. of PCNB 2-E LIQUID per 1,000 linear feet of row. Utilize an appropriate spray rig attached to the planter and spray 8 to 12 inch wide bands using 2 nozzles per planting furrow. Direct the front nozzle to treat the bottom of the open furrow and the seed as it is dropped from the planter and the rear nozzle to treat the soil as the seed is covered.

POTATOES

For Ahizoctonia solani AS A PRE-PLANTING BROADCAST SOIL TREATMENT use 9 to 12 1/2 gallons per acre mixed with sufficient water to total 25 gallons of use prey. Apply to the soil surface prior to planting and thoroughly disc to a depth of 4 inches by cross discing. Attach a harrow on the last discing, it is desirable to make this treatment when the soil is slightly moist. AS A FURROW TREATMENT use 5 gallons mixed in 15 gallons of water per 12,400 linear feet of row. Using three nozzles per row place the front "Fan" type nozzle ahead of the furrow opening disc with two "Cone" type nozzles placed above and slightly ahead of the closing discs in the rear. Select nozzles that will deliver about 1/3 of the spray mix per acre through each nozzle at the desired planting speed and pressure.

BROWN PATCH IN LAWNS AND ORNAMENTAL TURF

SOUTHERN GRASSES - For St. Augustine, Bermuda and similar warm season resses apply in the fall or spring at the first indication of disease by mixing 1 at in 10 to 15 gallons of water to treat 1,000 Sq.Ft. Select a suitable liquid applicator to give even coverage. Sprinkle the area after treatment to move the chemical to the soil level. If heavy rains or flooding occur retreat the area in 3 to 4 weeks. A temporary discoloration may occur but will disappear in a short time. Do not graze treated turf nor feed clippings to livestock.

DICHONDEA

Treat as for grass however use 1 1/2 quarts p at 40 gallons of water /1,000 Sq.Ft.

ORNAMENTAL AZALEAS AND CAMELLIAS

For Azalea Petal Blight & Camellia Flower Blight use ASADRENCH TREATMENT to the soil beneath the plants using 1 1/2 quart in 30 gallons of water per 150 Sq.Ft. Begin application prior to opening of buds and repeat every 3 to 4 weeks throught the bloom period.

NOTICE: This product conforms to its chemical description and is reasonably fit for the purpose stated on the label, when used in accordance with directions under normal conditions of use. Manufacturer is not responsible for use of product contrary to the label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the manufacturer and/or seller, and buyer assumes the risk of any such use.

(54-212A2.PM3/Sig. Wd./Pre-Statmta/Seed Trimt. Rev.11-15-91.)

PCNB 2-E LIQUID

EMULSIFIABLE CONCENTRATE SOIL FUNGICIDE

FOR CONTROL OF SOIL-BORNE DISEASES AS LISTED ON COTTON - BEANS - GARLIC - POTATOES TURFGRASS and ORNAMENTALS

See PCNB 2-E LIQUID Supplemental Booklet
For Use of Product as A Seed Treatment

ACTIVE INGREDIENT:

Pentachloronitrobenzene(PCNB)-INERT INGREDIENTS:*-----

24.0% <u>76.0%</u>

TOTAL 100.0%

Contains 2 pounds of PCNB per Gallon **Contains Aromatic Patroleum Solvent

DANGER

"PRECAUCION AL USUARIO: Si usted no les ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente"

STATEMENTS OF PRACTICAL TREATMENTS (

IF IN EYES: Immediately flush eyes with plenty of water. Get medical attention immediately. IF SWALLOWED: Call a physician or Poison Control Center immediately. Do not induce vomiting unless under the supervision of a physician. "Vomiting may cause aspiration pneumonia. This product contains an aromatic solvent. IF ON SKIN: Remove contaminated clothing and wash affected area with soap and water. Get medical attention if irritation persists. IF INHALED: Remove victim to fresh air, Apply artificial respiration if indicated.

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 5481-212

EPA EST NO. 5481-CA-1

NET CONTENTS 5 GALLON

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. ACCELEOS ANGELES, CA. 90023 U.S.A.

with COMMENTS Plated:

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AMENTAL TURF

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2-E LIQUID

EMULSIFIABLE CONCENTRATE SOIL FUNGICIDE

FOR CONTROL OF SOIL-BORNE DISEASES AS LISTED ON COTTON - BEANS - GARLIC - POTATOES TURFGRASS and ORNAMENTALS See PCNB 2-E LIQUID Supplemental Booklet For Use of Product as A Seed Treatment

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KEEP OUT OF REACH OF CHILDREN

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EPA REG. NO. 5481-212

EPA EST NO. 5481-CA-1

NET CONTENTS 5 GALLON

AMVAC CHEMICAL CORPORATION 4100 EAST WASHINGTON BLVD. ACCEDEDS ANGELES. CA. 90023 U.S.A.

with COMMENTS in the tratege

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

DANGER: Corrosive, causes irreversible eye demage. Doinct got in eyec. Wear goggles or face shield when handling. Hannful if swallowed, inhaled or absorbed through the skin. Avoid breathing Vapors of spray mist. Avoid contact with skin or clothing. This product may cause skin irritation. Wash hands and face after using and before eating or smoking. Avoid contact with skin by wearing the following protective clothing during mixing/loading operations; gloves, long sleeved shirt, long pants, socks and shoes (in addition professional applicators must wear an approved respirator). Use with adequate ventilation. Do not contaminate feed or foodstuffs.

ENVIRONMENTAL HAZARDS

This posticide is toxic to fish and aquetic organisms. Drift and runoff from treated areas may be hazardous to fish and aquatic organisms in adjacent aquatic sites. 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 contaminate water or wetlands when disposing of equipment washwaters. Do not apply directly adjacent to potable water supplies.

CHEMICAL AND PHYSICAL HAZARDS

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not plant root crops in PCNB treated fields within 12 months of broadcast and banding applications unless PCNB is registered for use on those crops. Do not apply this product through any type of irrigation system...

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. STORAGE: Store product in its original container in a cool, dry, locked place out of reach of children. Protect from temperatures below 20 degrees F. PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess posticide, 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved procedures by State and local authorities.

COTTON For Damping-Off caused by Rhizoctonia solani AS A ROW TREATMENT use 1/2 gallon for sandy soil and 1 gallon for organic soils per acre in a minimum of 15 gallons of water for 13,000 linear feet of row based on a 40 inch spacing. Direct the spray toward the seed and surrounding soil at planting time. Do not allow livestock to graze or feed on cotton foliage in PCNB treated fields.

BEANS

For Root and Stem Rot caused by Rhizoctonia solani AS A FURROW TREAT-MENT apply 2 to 3 quarts mixed in 6 to 10 gallons of water and apply to 14,500 linear feet of BUSH BEANS or 8,340 linear feet of POLE BEANS. Direct the spray to the base of planting furrow in front of seed drop and to the covering soil at planting time. Do not directly apray bare seed since delayed emergence may result, IN CALIFORNIA and ARIZONA use 3 to 4 pints in 8 to 10 gallons of water and apply to the same linear feet as above indicated for BUSH and POLE BEANS. Direct the spray to the furrow and to the covering soil at planting time. Use the lower rates for sandy and light soils. Do not برات الأوراد to bare seed.

(BEANS continued on next panel)

INERT INGREDIENTS:*- - - - 78.0%

TOTAL 100.0%

Contains 2 lbs. of PCNB/Gallon* Contains Aromatic Petroleum Solvent

KEEP OUT OF REACH OF CHILDREN DANGER

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EPA REG. NO. 5481-212

EPA EST NO. 5481-CA-1

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD.

LOS ANGELES, CA. 90023 U.S.A.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes eye damage. Do not get in eyes. Wear goggles or face shield when handling. Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing vapors or apray mist. Avoid contact with skin or clothing. This product may cause skin irritation. Wash hands and face after using and before eating or smoking. Avoid contact with skin by wearing the following protective clothing during mixing/loading operations; gloves, long sleeved shirt, long pants, socks and shoes (in addition professional applicators must wear an approved respirator). Use with adequate ventilation. Do not contaminate feed or foodstuffs.

ENVIRONMENTAL HAZARDS

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CHEMICAL AND PHYSICAL HAZARDS

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

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STORAGE AND DISPOSAL

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HOW TO APPLY

Apply PCNB 2-E LIQUID undiluted to the seed directly from the drum at recommended rates. If desirable add one part water to five parts PCNB 2 -E LIQUID Make sure to recalibrate equipment to deliver the recommended rate of actual PCNB 2-E LIQUID per 100 lbs of seed. Refer to following chart.

Planting	Rates /100 lbs.	Seedling Disease		
Seeds	Seed**(fl.oz.)	Complex		
Barley	4.20 to 8.40	Covered Smut		
Beans	3.35			
Corn	3.35	·		
Cotton***	12.0 to 16.20	Rhizoctonia & Fusarium		
Peas	3.35 to 6.70			
Sorghum	1.95			
Soybeans	3.35 to 6.70			
Rice	4.45 to 8.90	•		
Oats	6.13 to 12.26	Oat Smut		
Safflower	1.95 to 3.90	Seed-borne rust.		
		Rhizoctonia & Fusarium		
Sugar Beets	6.13 to 12.0	Rhizoctonia & Fusarium		
Wheat	3.35	Common Smut or Bunt		
		Rhizoctonia & Fusarium		

^{**}Use highest rate for pathologically infected seed and when conditions are known to favor the development of soil-borne diseases. ***For Cotton use the lower rate for acid delinted; the higher rate for mechanically delinted. (54-212SP.PM3/Seed Trtmt. Rates Reduction Sup. Bkt. Amdrnt.-11-25-91)

BEST AVAILABLE COPY

AS A SEED TREATMENT FUNGICIDE

FOR BARLEY - BEANS - CORN - COTTON - PEAS - SORGHUM - SOYBEANS - RICE - DATS - SAFFLOWER - SUGAR BEETS AND WHEAT FOR CONTROL OF USTED SMUT DISEASES AND DAMPING-OFF CAUSED BY RHIZOCTONIA DIRECTIONS FOR USE

It is a violation of Federal lawto use this produt in a manner inconsistent with its labeling. Do not plant any root crop not registered for PCNB in rotation on PCNB treated soil. Do not apply this product through any type of irrigation system.

SEED TREATMENT

Use PCNB 2-E LIQUID with suitable liquid or slurry type seed treating equipment such as Panogen or Mist-O-Matic and apply at the rates as indicated below. Seed to be used for planting should be sound, fully cured, cleaned and have an excellent germination record. Use the following seed treatment rates per 100 lbs. of seed.

IMPORTANT

The "Seed Treater" is responsible for the use of an approved seed treater Dye in the discoloration of seed that is to be treated and sold for further sales in interstate commerce. The Federal Government and most States have seed laws or regulations that require treated seed to be "tagged" with an appropriate caution statement such as the following. Check with such Agencies before release of treated seed.

TREATED SEED

This seed has been treated with PENTACHLORONITROBENZENE (PCNB) FUNGICIDE. Do not use for Food, Feed or Oil Purposes.

Limited Warranty Notice - Read Carefully

The treatment of poor quality of mechanically damaged seed, except for the curative control of existing diseases, may result in reduced germination and/or reduction of seed or seedling vigor. To avoid these results, first conduct germination tests on small portions of such treated seed before treating the entire lot. Due to seed conditions beyond our control no claims can be made to guarantee the germination of "carry-over" or such "damaged or low vigor" treated seed.

BEST AVAILABLE CONV