



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

FEB 23 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

H. R. McLane
AMVAC CHEMICAL CORP.
4100 East Washington Blvd
Los Angeles, CA 90023

Subject: Label Amendment Submission of 11/02/93 in Response to PR Notice 93-7
EPA Reg. No. 5481-434
TRE-HOLD FOR CITRUS

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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contains at least 50% recycled fiber

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Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling as amended

AND

- WITHIN one year from date of this acceptance.

Submit the final printed labeling via the U.S. Postal Service to:

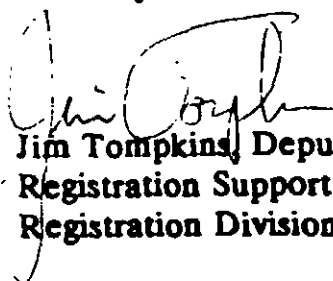
Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

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Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

H.R. McLane
AMVAC CHEMICAL CORP
4100 EAST WASHINGTON BLVD
LOS ANGELES CA 90023

Comment for: EPA Reg Nr.5481-434
TRE-HOID FOR CITRUS

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

The bodywear requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Long-sleeved shirt and long pants." The exact location is shown in Sections A and B on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Insert the following statement above the Agricultural Use Requirements box: "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." The exact location is shown in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

You have incorrect wording in the second-to-last sentence in the first paragraph in the Agricultural Use Requirements box on your proposed label. The sentence must be as follows: "It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval."

The eyewear requirement for early entry in the Agricultural Use Requirements Box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and

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AMVAC CHEMICAL CORP
EPA Reg. Number: 5481-434
TRE-HOLD FOR CITRUS
Application date: 11/02/93
Original Submission

add "Protective eyewear". The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

Correct the typographical errors circled on your proposed label.

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or inhaled. Avoid contact with eyes, skin or clothing.

STATEMENT OF PRACTICAL TREATMENT

IN CASE OF EYE CONTACT: Flush with plenty of water for at least 15 minutes. Get medical attention if irritation persists. **IN CASE OF SKIN CONTACT:** Wash with plenty of soap and water. Get medical attention if irritation persists. **IF INHALED:** Remove victim to fresh air. Get medical attention.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear coveralls, waterproof gloves; shoes plus socks, and protective eyewear. Follow 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.

ENVIRONMENTAL HAZARDS

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

PHYSICAL OR CHEMICAL HAZARDS

Do not use 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 Tre-Hold® Sprout Inhibitor for Citrus through any type of irrigation system. Proper pruning of young non-bearing trees promotes the growth and development of strong, well-spaced branches that can support more larger sized fruit, resist wind and ice damage, improve spray penetration for better insect and disease control and improve light penetration for better fruit set, size and color. Citrus and nectarine trees sprout vigorously from the root stock and from pruning cuts made on hard wood branches. Tre-Hold® Sprout Inhibitor for Citrus controls sprouting from pruning cuts, trunks, and root stocks. Tre-Hold® Sprout Inhibitor for Citrus is a ready to use product formulated in a white latex paint to protect against sun scald damage. For non-bearing nectarines, this product is diluted, see dilution chart. Thorough coverage immediately after pruning is necessary for maximum sprout inhibition. Do not allow Tre-Hold® to contact buds or foliage as injury may result. Mix thoroughly before using.

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 the 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). The requirement 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 12 hours.

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, waterproof gloves and shoes plus socks.

Tre-Hold®

SPROUT INHIBITOR FOR CITRUS

Ready-To-Use Formulation
Controls Sprouting on Non-Bearing Citrus and Non-Bearing Nectarines

ACTIVE INGREDIENT:

Ethyl 1-naphthaleneacetate - - - 1.15%

INERT INGREDIENTS:- - - - - 98.85%

Total 100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

For Additional Precautionary Statements See Side Panel

EPA REG. NO. 5481-434

EPA Est. No. 5481-CA-1

Tre-Hold® is a registered trademark of Rhone-Poulenc used under license by Amvac

NET CONTENTS 1 GALLON

AMVAC CHEMICAL CORPORATION

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

BEST AVAILABLE

EMENTS
STIC ANIMALS
 ctact with eyes, skin or clothing.
REATMENT
 ater for at least 15 minutes. Get
CONTACT: Wash with plenty
 ersists. **IF INHALED:** Remove
MENT (PPE)
 waterproof gloves; shoes plus
 instructions for cleaning/
 s. Use detergent and hot water.

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 ticide gets inside. Then wash
 mmediately after handling this
 g. As soon as possible, wash
RDS
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 ent, or to intertidal areas below
WARDS
 pen flame.

EMENTS
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 quirements for the protection of
 greenhouses, and handlers of
 ing, decontamination, notifica-
 fic instructions and exceptions
 al protective equipment (PPE).
 roduct that are covered by the
 ing the restricted-entry interval
 : permitted under the Worker
 ing that has been treated, such
 s and shoes plus socks.

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Tre-Hold®

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Ready-To-Use Formulation
 Controls Sprouting on Non-Bearing
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ACTIVE INGREDIENT:
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 Total 100.00%

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**
 For Additional Precautionary Statements See Side Panel

EPA REG. NO. 5481-434 EPA Est. No. 5481-CA-1
 Tre-Hold® is a registered trademark of Rhone-Poulenc
 used under license by Amvac

NET CONTENTS 1 GALLON

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

NON-BEARING CITRUS
 Use the product as supplied (undiluted) and follow the procedures described below for treating sprouts on scaffold limbs, trunks and rootstocks.

NON-BEARING NECTARINES
 For non-bearing nectarines first dilute the product to 1/4 the standard rate as shown in the following examples and follow the procedures described below for treating sprouts on scaffold limbs, trunks and rootstocks.

PRODUCT DILUTION FOR NECTARINES

AMOUNT OF Tre-Hold® Sprout Inhibitor Paint	AMOUNT OF WATER	TOTAL VOLUME
1 Quart	3 Quarts	1 Gallon
1 Gallon	3 Gallons	4 Gallons

This product is not for use on non-bearing nectarines in California

APPLICATION

Sprouting From Scaffold Limbs

Remove unwanted sprouts and thoroughly coat cut surfaces and surrounding bark.

Sprouting from Trunk

Remove trunk suckers and water sprouts and apply Tre-Hold® to the entire trunk from ground line to scaffold limbs.

Rootstock

Citrus rootstock which is healthy, vigorous and free from stress may be treated. After planting apply Tre-Hold® from the ground line to the first scaffold branches. Do not allow the product to puddle at the base of the tree as injury and stand loss may occur. Do not apply to rootstock if the bud union has not callused. In temperate zones where freezing may injure scaffold branches, restrict treatment to the frost-free period to allow for a short period of growth between treatment and damaging freeze.

STORAGE AND DISPOSAL

STORAGE: Do not store near fertilizers, seeds, insecticides or fungicides. Do not use or store near heat or open flame. **PESTICIDE 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:** Do not reuse empty container. 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 container is burned stay out of smoke.

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 the use of this product contrary to the label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the manufacturer and/or seller and the buyer assumes the risk of any such use.

(434-WPS PM4 / 11-01-93)

ACCEPTED
 with COMMENTS
 In EPA Letter Dated

FEB 23 1994
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registration under EPA Reg. No.
 5481-434

BEST AVAILABLE COPY