

SEP 8 1997

Mr. Dennis L. McFadden, Manager
Toxicology and Regulatory Affairs
Gustafson, Inc.
P.O. Box 660065
Dallas, TX 75266-0065

Dear Mr. McFadden,

Subject: Label revisions for Gustafson Apron, EPA Reg. No. 7501-132 and Gustafson Apron FL, EPA Reg. No. 7501-42 submitted June 18 and June 20, 1997 respectively. The May 22, 1997 submission for 7501-42 was superseded by the June 20, 1997 submission and will not be addressed.

The labeling for 7501-42 is not acceptable because the reentry interval must be 24 rather than 12 hours. This is based on an acute toxicity category II for eye irritation of the technical product per the metalaxyl RED. The following additional label revisions are needed:

- 1). Under precautionary statements, correct the spelling of "absorbed".
- 2). Under directions for use for forage grasses, revise to read "Grasses grown for hay, grazing or silage..." in both places in the first sentence.

The labeling for 7501-132 is acceptable, but should be revised in the following manner at the next printing:

- 1). Under directions for use for forage grasses, revise to read "Grasses grown for hay, grazing or silage..."
- 2). Under directions for use on forage legumes, revise to read "... soybeans (for forage), soybean hay..."

CONCURRENCES							
SYMBOL	7505C						
SURNAME	Ellwanger						
DATE	8/20/97						

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If you have questions on these two submissions, please contact Dr. Tom Ellwanger at (703) 308-9352.

Sincerely,

Mary L. Waller

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

ACCEPTED
with COMMENTS
In EPA Letter Dated
SEP 8 1997

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

7501-132

Gustafson APRON®

Dry Seed Protectant Fungicide

ACTIVE INGREDIENT:

Metalaxyl.....12.5%

INERT INGREDIENTS:.....87.5%

TOTAL**.....100.0%

**Contains Graphite

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements.

EPA Reg. No. 7501-132

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT:

Applicators and other handlers must wear: long-sleeved shirt and long pants, socks and shoes and waterproof gloves.

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. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger or if available by administering syrup of ipecac. If person is unconscious, do not give anything by mouth and do not induce vomiting.

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

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

ENVIRONMENTAL HAZARDS

For terrestrial uses, 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 apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment washwaters.

Groundwater Advisory: 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 contamination.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE**—Store in a cool, dry location. Do not store in direct hot sunlight.

PESTICIDE DISPOSAL—Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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

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.

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), and restricted-entry interval. 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 24 hours. Exception: if the

continued next page

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product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated. 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, socks and chemical resistant footwear and waterproof gloves.

GENERAL INFORMATION

APRON is a systemic fungicide seed dressing specifically for control of systemic downy mildews and seedling diseases caused by soilborne *Pythium* and *Phytophthora spp.* For control of other soilborne diseases, such as *Rhizoctonia spp.*, APRON Dry should be applied in combination with other registered seed dressing fungicides.

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

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

Gustafson APRON Dry Seed Protectant Fungicide is a dry powder formulated specifically for seed treatment application. Unique formulation technology has been incorporated to help lubricate the planter; thus allowing a smooth, even flow of seed to the furrow, while providing uniform seed coverage and adherence to the seed.

Gustafson APRON Dry should be applied by thoroughly mixing with seed in the planter box with the Mighty Mixer or utilizing the Gustafson CF-80* treater or other dry seed treatment application equipment to maximize seed coverage. (*Calibrate the Gustafson CF-80 treater as per the manufacturer's instruction).

SEED TREATMENT

Cotton : For *Pythium* seed rot and damping-off: Apply APRON Dry as a seed treatment to machine delinted or acid delinted cottonseed at the rate of 3-4 ounces per 100 lbs. of seed.

Forage Grasses : Grasses grown for hay grazing of silage, corn (fodder or silage), and small grain grown for hay or silage. For *Pythium* damping-off control: Apply APRON Dry as a seed treatment at the rate of 3-4 ounces per 100 lbs. 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 APRON Dry as a seed treatment at the rate of 4 ounces per 100 lbs. of seed. For suppression of early season downy mildew in alfalfa and soybeans: Apply APRON Dry as a seed treatment at the rate of 4 ounces per 100 lbs. of seed.

Garden Beets : For control of *Pythium* damping-off: Apply APRON Dry as a seed treatment at the rate of 4 ounces per 100 lbs. 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 APRON Dry as a seed treatment at the rate of 3-4 ounces per 100 lbs. of seed.

Turfgrasses (All) : For *Pythium* damping-off control on golf courses, home lawns, reclamation and erosion control projects: Apply APRON Dry as a seed treatment at the rate of 4-8 ounces per 100 lbs. 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 APRON Dry as a seed treatment at the rate of 4 ounces per 100 lbs. of seed.

Sorghum : For control of *Pythium* damping-off on all sorghum cultivars, use 4 ounces of APRON Dry per 100 lbs. of seed applied as a seed treatment. For control of Systemic Downy Mildew, apply 4 ounces of APRON Dry per 100 lbs. 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 8 ounces of APRON Dry per 100 lbs. of seed as a seed treatment. Only high quality sorghum seed (90% germ and above) should be treated with APRON Dry.

Sugar Beets : For control of *Pythium* damping-off: Apply APRON Dry as a seed treatment at the rate of 4 ounces per 100 lbs. of seed.

Soybeans : For *Pythium* damping-off and early season *Phytophthora* control: Apply APRON Dry as a seed treatment at the rate of 3-4 ounces per 100 lbs. of seed.

Sunflower : For control of Systemic Downy Mildew: Apply APRON Dry as a seed treatment at the rate of 8 ounces per 100 lbs. of seed.

USE PRECAUTIONS

- 1. For planters with electric eye monitors, periodically clean them with brushes provided by the planter manufacturer, according to their directions.
- 2. Treated seed must not be used or mixed with food or animal feed, or processed for oil.
- 3. Treat only those seeds needed for immediate use, minimizing the interval between treatment and planting.
- 4. Do not carry over excess treated seeds to next season.
- 5. Do not use this product on seed which has been commercially treated with Metalaxyl (APRON) Fungicide.

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

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, 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 Gustafson, Inc., no claims are made to guarantee germination of carry-over seed.

As its sole express warranty, Gustafson, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for purposes stated on the label only when used in accordance with directions and instructions specified on the

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label, subject to the inherent risks set forth above. ONLY AS PERMITTED BY APPLICABLE LAW, IN THE EVENT OF A BREACH OF THIS LIMITED WARRANTY, GUSTAFSON, INC. SHALL NOT BE LIABLE FOR CONSEQUENTIAL DAMAGES. SUBJECT TO APPLICABLE LAW, GUSTAFSON, INC. NEITHER MAKES NOR AUTHORIZES ANY OF ITS AGENTS OR REPRESENTATIVES TO MAKE ANY WARRANTY OF FITNESS OR MERCHANTABILITY, GUARANTY OR REPRESENTATION, EXPRESS OR IMPLIED, CONCERNING THIS MATERIAL. Buyer assumes the responsibility to handle, use and store this product in accordance with the safety instructions and use directions contained on the label.

Buyer/User purchases this product subject to the foregoing Conditions of Sale and Limited Warranty, which, subject to applicable law, may be varied only by a written agreement signed by a duly authorized representative of Gustafson, Inc. If these terms are not acceptable, return all products to the place of purchase, unopened for a full refund.

Gustafson (Logo) is a Reg. TM of Gustafson, Inc.
APRON is a Reg. TM of Novartis Crop Protection, Inc.

A quality product manufactured by:

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