

SEP 28 2001

Dr. Thomas R. Nelsen
BASF Corporation
Agricultural Products
P.O. Box 13528
Research Triangle Park, NC 27709-3528

Dear Dr. Nelsen:

Subject: Ronilan EG
EPA Reg. No. 7969-85
Your Submission of August 30, 2001

The supplemental label for use in greenhouse production of conifer seedlings submitted in connection with registration under FIFRA sec. 3(c)(7)(A) is acceptable, provided that the following labeling changes are made prior to release of the product for shipment.

1. Under Personal Protective Equipment, add "Some materials that are chemical-resistant to this product are (insert correct materials). If you want more options, follow the instructions for category (insert correct category) on an EPA chemical resistance category chart." (See Vinclozolin RED)

2. Under Engineering Controls Statement, delete "or aircraft". Add: "This product is formulated into water-soluble packets and when used correctly, it qualifies as a closed mixing/loading system under Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(4)]. Mixers and loaders using water-soluble packets must: wear the PPE required above for mixers and loaders, and be provided and must have immediately available for use in an emergency, such as broken package, spill or equipment breakdown, coveralls and chemical resistant footwear." (See Vinclozolin RED)

3. In the Agricultural Use Requirements box, correct the following typographical errors: Immediately following the REI of 12 days, correct "Exception". In the second line of paragraph "Advisory to CCAs", correct "Certified"; in the fourth line, correct "scouting" and in the last line, change to "inches per".

4. Revise the heading for the specific directions for use to "Time and Rate of Application of Curalan EG for Control of Botrytis spp. in Conifer Seedlings." Change the second sentence

to "Apply three pounds of Curalan EG per acre per application (1.1 ounces/1000 square feet)." Revise the fourth sentence to read "Do not apply more than 12 pounds of product/acre/season. In the fifth sentence, correct "essential".

5. Beneath the Warranty Statement, change "WARNING" to "ATTENTION" in both statements. The word "WARNING" may only be used on the label as a signal word.

Submit one (1) copy of the final printed labeling before you release the supplemental label for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely yours,



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

Enclosure

7505C:CGrable:cg:9/28/01

Supplemental Label

Expires August 30, 2003

Curalan® EG

fungicide

For use in greenhouses on conifer seedlings

EPA Reg. No. 7969-85
EPA Est. No. 39578-WG-01

FIRST AID	
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
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.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact BASF Corporation for emergency medical treatment information: 1-800-832-HELP (4357)	

Precautionary Statements

Hazards to Humans and Domestic Animals

Caution. Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Do not get on skin, in eyes, or on clothing. Avoid breathing vapor or spray mist. Prolonged exposure or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE)

Mixers and loaders must wear:

- Long sleeved shirt and long pants
- Socks and shoes
- Chemical resistant gloves
- Chemical resistant apron

Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment

User Safety Requirements

Wash thoroughly with soap and water after handling. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not re-use them. Follow the manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Users should inform Certified Crop Advisors (as defined by the Worker Protection Standard (WPS)) that people engaged in scouting activities should wear early entry PPE when entering treated areas during the first 7 days following application.

Engineering Controls Statement

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.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove PPE 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

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

Ground Water Advisory

Vinclozolin has a degradation product with properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

Surface Water Advisory

Under some conditions, the vinclozolin degradate 3,5-DCA may have a high potential for runoff into surface water (primarily via dissolution in runoff water). These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, over-laying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain surface water.

Directions For Use

It is a violation of federal law to use this product in a manner inconsistent with its labeling. This product is not permitted for residential use. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Do not allow this product to 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.

All applicable directions, restrictions, precautions and **Conditions of Sale and Warranty** are to be followed. This labeling and the packaging label must be in the user's possession during application.

Agricultural Use Requirements	
<p>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.</p>	
<p>Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 days. Exemption: in addition to the early entry exemptions allowed by the Worker Protection Standard, the activities listed below are allowed during the REI provided workers are wearing at least long sleeved shirt, long pants, shoes and socks.</p>	
Time following application after which entry is permitted	Activities Allowed
7 days	weeding and scouting
3 days	irrigating

Agricultural Use Requirements Cont.
<p>Notify workers or scouts of the exception (including when entry is permitted for each of the tasks named in the exception) by warning them orally OR by posting warning signs at entrances to treated areas.</p> <p>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:</p> <ul style="list-style-type: none"> • Coveralls over long-sleeved shirt and long pants • Chemical Resistant Gloves made of any waterproof material • Chemical-resistant footwear plus socks • Chemical-resistant headgear for overhead exposure <p>Advisory to Certified Crop Advisors: Users should inform Certified Crop Advisors [as defined by the Worker Protection Standard (WPS)] that people engaged in scouting activities should wear coveralls, shoes, and socks, and chemical resistant gloves made of any waterproof material when entering treated areas during the first 48 hours following application (72 hours in areas where average rainfall is less than 25 inches per year).</p>

Storage and Disposal
<p>Do not contaminate water, food, or feed by storage or disposal.</p> <p>Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.</p> <p>Container Disposal: This package contains water-soluble bags inside a foil liner (outer bag). The water-soluble bags dissolve in water and the contents will disperse. If all the water-soluble bags are not used, carefully reseal the foil bag. Each foil bag contains five water-soluble bags. Do not remove the water-soluble bags from the overwrap bags except for immediate use. If exposed to moisture, the water-soluble bags may break. The outer box and inner overwrap packaging of the water-soluble bags should be incinerated or disposed of in a sanitary landfill, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Do not re-use the empty packaging.</p>

Time and Rate of Application for Control of Curalan® EG Botrytis spp. in Conifer Seedlings
 Curalan EG may be applied up to four times per growing season. Three pounds of Curalan EG per acre per application (1.1 ounces/1000 square feet) should be used. The minimum time between applications is 10 days. No more than twelve pounds of product should be applied per season. Thorough spray coverage is essential. Therefore, use adequate spray volume and proper spray equipment. Note that plants grown in narrow rows form a dense canopy early. This may promote disease development and decrease spray penetration. Particular attention to spray coverage is required in this situation.

When applying Curalan EG use a minimum of 20 gallons of water per acre.

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

SEP 28 2001

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

7969-85

Conditions of Sale and Warranty

The **Directions For Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with the 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 use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF"), or the Seller. All such risks shall be assumed by the Buyer. BASF warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks referred to above. BASF MAKES NO OTHER EXPRESSED OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL BASF OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BASF and the Seller offer this product, and the Buyer and User accept it, subject to the foregoing **Conditions of Sale and Warranty**, which may be varied only by agreement in writing signed by a duly authorized representative of BASF.

WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.

WARNING: This product contains a chemical known to the State of California to cause cancer.
Made in Germany.

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