

FEB 4 1993

Berthold Volger, Ph.D.  
Hoechst Celanese Corporation  
P.O. Box 2500  
Somerville, NJ 08876-1258

Dear Dr. Volger:

Subject: Amended Terms and Conditions of Registration and Amended  
Labeling  
Brestan H 47.5 WP  
EPA Registration No. 8340-15  
Photon Fungicide  
EPA Registration No. 8340-41 ✓  
Your Submissions Dated January 12, 1993

This letter grants your request to amend the terms and conditions of the above referenced product registrations as set forth in your letter of January 12, 1993.

The amended labeling for Photon Fungicide, EPA Registration No. 8340-41, referred to above, submitted in connection with registration under the FIFRA, as amended, is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. According to PR Notice 82-1, the Tank Mix directions for SUPER SIX and "another fungicide registered for disease control" must include statements similar to the following:

This product can be mixed with \_\_\_\_\_  
(chemical name, including percentage of active ingredient and type of formulation, or specific product name, or both) for use on \_\_\_\_\_ (Crops/sites) in accordance with the more (most) restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing.

b. In the directions for use on sugar beets it appears you deleted a line. Reinstate the following:

Cercospora

Ground (Closed Cab Only):

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c. In the Restricted Uses statement replace "effects" with "development" to read as follows:

**RESTRICTED USE PESTICIDE**

Because of the high acute toxicity of triphenyltin hydroxide and its potential for affecting fetal development, this product may be applied only by certified applicators or persons directly under their supervision.

d. Please note that the word POISON must appear in red letters.

e. The statement "application rates are for general use" must either be deleted or modified so as to stress that label maximum application rates must not be exceeded.

f. Proof read the label. In the PRECAUTIONS section on page 4 correct the spelling of "be".

g. Add the following:

During aerial application human flaggers are prohibited unless in totally enclosed cabs.

h. The instruction for chemigation must specify that posted signs remain in place for the duration of the restricted entry interval.

i. Modify the reentry statements to read as follows:

Do not enter treated areas without appropriate protective clothing equivalent to that worn by the applicator (see Label Precautionary Statement) for 24 hours after treatment.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

Hoechst may not sell or distribute, except for the purpose of a recall, any TPTH end-use products, after October 1, 1993, unless these products are in water soluble packages or bear labeling requiring mechanical transfer systems for all mixing and loading.

Failure to comply with any terms and conditions contained in the amended registration could result in issuance of a Notice of Intent to Cancel pursuant to the terms of the amended registration.

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

Sincerely yours,

Cynthia Giles-Parker  
Product Manger (22)  
Fungicide Herbicide Branch  
Registration Division (H7505C)

Enclosure

cc: Margaret Rice  
Special Review Branch  
Special Review and Reregistration Division (H7508W)

REVISED: 1/6/93

**RESTRICTED USE PESTICIDE**

Because of the high acute toxicity of triphenyltin hydroxide, and its potential for affecting fetal effects, this product may be applied only by certified applicators or persons directly under their supervision

**PHOTON® FUNGICIDE**

**Triphenyltin Hydroxide Flowable Fungicide for  
Use on Pecans, Potatoes, and Sugar Beets**

**Active Ingredient:**

Triphenyltin hydroxide. . . . .	40.0%
Inert Ingredients. . . . .	60.0%
Total: . . . . .	100.0%

Contains 4 pounds triphenyltin hydroxide per gallon  
(480 grams per liter).

**KEEP OUT OF REACH OF CHILDREN  
DANGER - PELIGRO**

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



**POISON**



FEB 4 1993

Under the Federal Insecticide  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
8340-41

**STATEMENT OF PRACTICAL TREATMENT**

- IF ON SKIN: Wash with plenty of soap and water.
- IF INHALED: Remove victim to fresh air, If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.
- IF IN EYES: Flush with plenty of water. Call a physician.
- IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. call a physician or Poison Control Center.

"PRECAUTION AL USUARIO: Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado amptiamente."

See Additional Precautionary Statements.

**NET CONTENTS: 2-1/2 Gallons**

**Hoechst Celanese**

EPA REG. NO. 8340-41  
EPA EST. NO. 8340



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**PRECAUTIONARY STATEMENTS****HAZARD TO HUMANS & DOMESTIC ANIMALS****DANGER - PELIGRO**

**DANGER:** Fatal if inhaled. Corrosive, causes irreversible eye damage. May be harmful or fatal if swallowed or absorbed through the skin. Do not get in eyes, or on skin. Do not breathe dust, vapor or spray mist. When handling either products containing TPTH or spray diluted mixtures, wear protective clothing (cotton overalls over long pants and long sleeved shirt, chemical resistant gloves including neoprene-coated, butyl rubber and nitrile rubber), chemical resistant aprons, hat, boots and a pesticide respirator jointly approved by the NIOSH and the Mine Safety and Health Administration, (MSHA -formally the Mining Enforcement and Safety Administration). If totally enclosed cab tractors with positive pressure filtration systems or enclosed cockpit aircraft are used, long sleeved shirt, long pants, socks, and shoes may be the only clothing items necessary for the applicator. However, gloves must be available in the cab or cockpit for use upon exiting. The cab or cockpit should be equipped with a sealable container for glove storage. When handling the concentrated products, wear a face shield. Wash thoroughly with water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse. Do not enter treated areas for at least 24 hours after treatment. If treated areas must be reentered prior to expiration of the interval, protective clothing equivalent to that worn by the applicator must be worn.

The United States Environmental Protection agency has determined that triphenyltin hydroxide, the active ingredient of this product, affects fetal development in laboratory animals. Exposure to this product during pregnancy should be avoided.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and wildlife. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Cover or incorporate spills. Do not contaminate water when disposing of equipment washwaters.

**For spill emergency - call Chemtrec 1-800-424-9300**

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**DIRECTIONS FOR USE**

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

**RE-ENTRY STATEMENT**

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

Do not enter treated areas without protective clothing for 24 hours after treatment.

) Because certain states may require more restrictive re-entry intervals for various crops treated with this produce, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this produce. (Indicate specific oral warnings which inform workers of areas or fields that may not be entered without specific protective clothing, period of time field must be vacated and appropriate actions to take in case of accidental exposure.) When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: **DANGER:** Area treated with Photon Fungicide on (date of application). Do not enter treated areas without appropriate protective clothing for at least 24 hours after treatment. In case of accidental exposure, see Statement of Practical Treatment.

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**STORAGE AND DISPOSAL**

Do not contaminate water food, or feed by storage or disposal.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**PESTICIDE DISPOSAL:** Pesticide wastes are actually hazardous. Improper disposal of excess pesticide, 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.

**PRECAUTIONS**

Photon Fungicide can be applied in combination with SUPER SIX<sup>TM</sup> for additional fungicidal control. Do not add surfactants, spreaders, stickers or buffers. Combinations with some pesticides, micro-nutrients, spreaders, stickers, surfactants or buffering agents can increase phytotoxicity. Phytotoxicity may be severe. Emulsifiable concentrate insecticides can be especially injurious in combination. We do not recommend mixture with the above unless testing or prior experience has shown the mixture to be non-phytotoxic to the crop. Do not graze dairy or meat animals in treated areas.

**GENERAL INFORMATION**

Photon Fungicide is a non-flammable, flowable fungicide.

Photon Fungicide can be applied as a ground or aerial spray to control fungal infestations on listed crops. A mechanical transfer system is required for all mixing and/or loading of this product. A "mechanical transfer system" is defined as a mechanism capable of removing the pesticide from the shipping container and transferring the pesticide into mixing tanks and/or application equipment to prevent worker exposure to the pesticide. A closed system is required for aerial applications. The closed system for mixing and/or loading this product must be capable of removing the pesticide from the shipping container, rinsing the container and transferring the pesticide and rinseate into mixing tanks and/or application equipment. Protective clothing and equipment specified in the pesticide labeling, must also be used when mixing and/or loading this pesticide. Application rates are for general use. The state agricultural extension or agricultural experiment station specialist should be consulted for specific applications and timing recommendations. With any spray application, thorough coverage is essential for good control.

**GENERAL CHEMIGATION INSTRUCTIONS**

Do not apply this product through any type of irrigation system on crops other than potatoes.

Applications of this product through sprinkler irrigation system(s) are limited to center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move systems. Do not apply this product through any other type of irrigation system. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water. If you have questions about calibration, you should contact State extension service specialists, equipment manufacturers, or other experts.

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Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

The 24 hour reentry interval also applies to areas treated by chemigation. The general chemigation instructions should be modified to state that treated areas must not be entered for 24 hours after application unless protective clothing equivalent to that worn by the applicator is worn.

#### RECOMMENDATIONS:

Keep agitator running in supply tank during irrigation operations.

Apply continuously for the duration of the water application when using moving systems.

Mixing instructions for dilution of pesticide in supply tank:

Pour label-recommended amount of Photon® Fungicide into mixing tank nearly filled with water and mix thoroughly or pre-mix in a bucket before pouring into mixing tank. Keep agitator running during filling.

#### SPRINKLER CHEMIGATION

##### GENERAL INSTRUCTIONS:

The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

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The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

#### POSTING:

Posting of the areas to be chemigated is required when:

- 1) any part of a treated area is within 300 feet of sensitive areas, such as residential areas, labor camps, businesses, day care centers, hospitals, in-patient clinics, nursing homes, or any public areas, such as schools, parks, playgrounds, or other public facilities not including public roads, or
- 2) when the chemigated area is open to the public.

Posting must conform to the following requirements:

Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The printed side of the sign should face away from the treated area toward the sensitive area. The signs shall be printed in English. Signs must be posted prior to application

and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2-1/2 inches tall, and all letters and the symbol shall be a color which sharply contrasts with their immediate background. At the top of the

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sign shall be the words **KEEP OUT**, followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word **STOP**. Below the symbol shall be the words **PESTICIDES IN IRRIGATION WATER**.

#### GENERAL INSTRUCTIONS FOR APPLICATION

CROP	DISEASE	RATE/ACRE (fl. oz.)	USE DIRECTIONS
Sugar Beets	Leafspot	4 - 8	<p>Apply in at least 15 gallons of water. Full coverage of the foliage is necessary for best results.</p> <p><u>Aerial (helicopter or fixed wing aircraft):</u> Apply in 5-10 gallons of water.</p> <p>Diluted spray should be directed uniformly to all parts of the plant. Use lower gallonage when plants are small and increase volume with plant size. Use lower rate for protective sprays and the higher rates later in the season or during high infection periods. Application should begin when leafspot conditions appear or when the disease is in the area and repeated at 10-14 day intervals. Do not exceed 24.0 fluid ounces per acre per season. Do not treat within 21 days of harvest. Do not graze or feed beet tops to livestock.</p>

CROP	DISEASE	RATE/ACRE (fl. oz.)	USE DIRECTIONS
Potatoes	Early & Late Blight, Suppression of Colorado Potato Beetle	4 - 6*	<p><u>Ground (Closed Cab Only):</u> Apply in at least 15 gallons of water. Full coverage of the foliage is necessary for best results. A spray pressure of less than 200 psi is recommended.</p> <p><u>Aerial:</u> Apply in 3-10 gallons of water. For helicopter application, fly high enough so as not to whip the vines.</p> <p>Diluted spray should be directed uniformly to all parts of the plant and the gallonage increased according to the size of the plants. Application should begin with the appearance of blight weather conditions and continue as needed. The lower rate of application should be used early in the season and the high rate mid to late season or when blight infection is in the area. Do not exceed 24.0 fluid ounces per acre per season. Do not treat within 21 days of harvest.</p>

**\*PEST MANAGEMENT SYSTEMS:** When used in combination with another fungicide registered for disease control on potatoes, a 3.0 fluid ounce rate may be employed.

**CHEMIGATION:** Do not apply this product through any type of irrigation system on crops other than potatoes. Refer to **CHEMIGATION INFORMATION** section for complete instructions.

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CROP	DISEASE	RATE/ACRE (fl. oz.)	USE DIRECTIONS
Pecan	Scab, Brown Leafspot, Downy Spot, Powdery Mildew, Liver Spot, Sooty Mold, Leaf Blotch	8 - 12	<p><u>Ground (Closed cab Only):</u> Apply in sufficient water to provide for full coverage.</p> <p><u>Aerial:</u> Apply in Minimum of 20 gallons or water.</p> <p>Diluted spray should be directed to all parts of the tree. Application should begin at pre- pollination stage when the young leaves are unfolding, and a second application made when the small nuts are forming. Apply a maximum of 10 treatments during a single growing season at 2-4 week intervals as needed to maintain control. Use the lower rate for the first two applications or until the disease becomes severe, or during dry weather. Use the higher rate during wet weather or during severe scab, powdery mildew, or other disease infec- tions. Do not apply after shucks have started to open.</p>

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**IMPORTANT NOTICE; DISCLAIMER**

Read **IMPORTANT NOTICE; DISCLAIMER** before buying or using. if terms are not acceptable, return at once unopened. **HOECHST CELANESE CORPORATION** warrants only that the product conforms to the chemical description on the label and is reasonably fit for the purpose stated on the label when used in accordance with the directions under normal conditions for use. This warranty does not extend to the use of this product contrary to label instructions or under abnormal conditions, under conditions not reasonably foreseeable to **HOECHST CELANESE CORPORATION**, and user assumes the risk of any such use. **HOECHST CELANESE CORPORATION MAKES NO OTHER WARRANTY, EXPRESSED OR IMPLIED, INCLUDING ANY IMPLIED WARRANTY OF FITNESS OR A PARTICULAR PURPOSE OR OF MERCHANTABILITY.** In no case shall **HOECHST CELANESE CORPORATION** be liable for consequential, special, indirect or incidental damages resulting from the use or handling of this product. The foregoing conditions of sale and warranty can be varied only by an agreement in writing signed by a duly authorized representative of **HOECHST CELANESE CORPORATION**.