

pm 25

10182-159

10/10 File



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

MAR 24 1994

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

Wayne R. Hillebrecht
ZENECA INC.
1800 Concord Pike
Wilmington, DE 19897

Subject: Label Amendment Submission of 11/09/93 in Response to PR Notice 93-7
EPA Reg. No. 10182-159
TILLAM 10G

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 reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (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 not been reviewed or 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:

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
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber


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

Hand or courier deliveries of final printed 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

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Wayne R. Hillebrecht
ZENECA INC
1800 CONCORD PIKE
WILMINGTON DE 19897

Comment for: EPA Reg Nr.10182-159
TILLAM 10G

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 Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

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(Stauffer Shield)

TILLAM® 10-G

Granules - A Selective Herbicide

ACTIVE INGREDIENT:

S-propyl butylethylthiocarbamate 10%

INERT INGREDIENTS:

..... 90%
100%

Contains 10 Pounds Active Ingredient per 100 lbs.

KEEP OUT OF REACH OF CHILDREN

CAUTION

HARMFUL IF SWALLOWED

Statement of Practical Treatment

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 24 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
10182-159

If a known exposure occurs or is suspected, immediately start the procedures given below. If further treatment is required, contact a Poison Center, a physician, or the nearest hospital, or call collect day or night: (203) 226-6602 Stauffer Chemical Company, or (800) 424-9300 Pesticide Team Safety network.

If ingested: Immediately give large amounts of water and include vomiting by gagging the victim with a finger placed on the back of the victim's tongue. Give fluids until vomitus is clear. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. Call a physician immediately.

For eye contact: Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart during flushing to ensure rinsing of the entire surface of the eye and lids with water. Call a physician.

For skin contact: Wash all affected areas with plenty of soap and water. Seek medical attention if irritation occurs.

If inhaled: Remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen, preferably with a physician's advice.

This product is sold only for uses stated on its label. No express or implied license is granted to use or sell this product under any patent in any country except as specified: Country: United States of America. Patent Nos: 3,175,897; 3,185,720.

50 LB. NET WT. 22.7 kg

EPA Reg. No. 476-1616
EPA Est. 476-AR-1

RS-840824

Made In U.S.A. by
STAUFFER CHEMICAL COMPANY
WESTPORT, CT 06881-0850

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Avoid contact with skin, eyes and clothing. Avoid inhalation of dust. ~~Wear rubber gloves and fresh clothing. Wear goggles to avoid contact with eyes. Wash with soap and water immediately after use or contact.~~ Do not contaminate food and feed.

Personal Protective Equipment

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- 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.

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 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 - 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 contaminate water when disposing of equipment washwaters.

WEEDS CONTROLLED

Annual Grasses:

- Barnyardgrass (Watergrass) (Echinochloa spp.)
- Crabgrass (Digitaria spp.)
- Foxtails -- yellow, green, giant (Setaria spp.)
- Millet (Setaria spp.)
- Wild Oats (Avena fatua)

Annual Broadleaf Weeds:

BEST AVAILABLE COPY

- Black-Eyed Susan; Sweet Suzy (*Rudbeckia serotina*)
- Common Purslane (*Portulaca oleracea*)
- Deadnettle, Henbit (*Lamium amplexicaule*)
- Florida Purslane (*Richardia scabra*)
- Hairy Nightshade (*Solanum villosum*)
- Lambsquarters (*Chenopodium album*)
- Nettleleaf Goosefoot (*Chenopodium murale*)
- Prostrate Pigweed (*A. graecizans*)
- Redroot pigweed (*Amaranthus retroflexus*)

The above broadleaf weeds will be controlled only when TILLAM is applied when conditions are favorable for germination.

Perennial Weeds:

- Yellow Nutsedge (Yellow Nutgrass) (*Cyperus esculentus*)
 - Purple Nutsedge (Purple Nutgrass) (*Cyperus rotundus*)
- Existing stands of nutgrass must be turned under and chopped up thoroughly before treatment.

GENERAL USE PRECAUTIONS

READ ALL LABEL DIRECTIONS BEFORE USING.

TILLAM 10-G should be used only for recommended purposes and at recommended rates (DO NOT OVERDOSE): Applied according to directions and under normal growing conditions, TILLAM 10-G will not harm the treated crop. During germination and early growth, extended periods of unusually cold and wet or hot and dry weather, insect, nematode, or plant disease attack, the use of certain soil applied systemic insecticides, highly saline or alkaline soil conditions, improperly placed fertilizers or soil insecticides may create abnormal conditions that weaken crop seedlings. TILLAM 10-G used under these abnormal conditions could result in crop injury.

Do not apply in combination with fertilizer, insecticide or fungicide.

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DIRECTIONS FOR USE OF TILLAM 10-G

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 protection 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 12 hours. Exception: If the 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
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

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TILLAM 10-G is a selective herbicide which is mixed (incorporated) into the soil for control of weeds listed on this label. TILLAM 10-G controls weeds by interfering with normal seed germination and seedling development. It does not control established weeds. All weed growth and crop stubble should be thoroughly worked into the soil before treatment.

APPLICATION DIRECTIONS: Apply uniformly the recommended rate of TILLAM 10-G using equipment designed for application of granular herbicides. Equipment should be carefully calibrated before use and checked frequently during application to be sure equipment is working properly and delivering a uniform distribution pattern. Avoid overlaps that will increase TILLAM 10-G dosage above recommended rates as plant injury may occur. Apply only to well-worked soil that is dry enough to permit good soil mixing (incorporation). In irrigated areas, do not apply TILLAM 10-G before pre-irrigation.

For all band applications, reduce dosage proportionately depending upon row spacing and band width. Do not use band application on rocky ground because thorough incorporation is

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not possible.

Transplants: TILLAM 10-G may be applied prior to mechanical transplanting only. DO NOT apply TILLAM 10-G prior to hand transplanting.

INCORPORATION DIRECTIONS: TILLAM 10-G must be mixed (incorporated) into the soil IMMEDIATELY after application to prevent loss by evaporation of the herbicide. Whenever possible, application and incorporation should be done in the same operation.

INCORPORATION BEFORE PLANTING: Use power-driven cultivation equipment set to cut to a depth of 2 to 3 inches in light soils and 3 to 4 inches in heavy soils, OR tandem discs set to cut to a depth of 6 inches, followed by a spiketooth harrow or some other leveling device which extends beyond ends of the disc. For thorough mixing, disc in two different directions (cross disc).

INCORPORATION AT OR AFTER PLANTING: Use power-driven cultivation equipment set to cut to a depth of 2-3 inches OR, on light soils only, ground-driven tillers (rolling cultivators, rotary hoe, row wheels, etcetera) set to cut to a depth of 1-1/2 inches and operated at 6 to 8 mph. When using ground driven tillers, pre-cultivate if soil is crusted. When incorporating after planting, care must be taken not to disturb the crop seedling.

PLANTING

For maximum weed control benefits, crops should be planted or seeded immediately after application. DO NOT use a drag behind the planter as it may concentrate TILLAM 10-G over the seed row and cause crop injury.

CULTURAL PRACTICES FOLLOWING APPLICATION

TILLAM 10-G is not persistent in the soil and susceptible weeds germinating late in the season may not be controlled. Shallow cultivation or approved post emergence herbicides may be necessary to control these susceptible weeds that escape control by TILLAM 10-G as well as those weeds not susceptible to TILLAM 10-G. Do not cultivate deeper than the depth of herbicide incorporation.

When cultivating fields where TILLAM 10-G has been banded in the row, use shields to prevent the movement of untreated soil into the treated row.

Transplants: TILLAM 10-G may be applied prior to mechanical transplanting only. DO NOT apply TILLAM 10-G prior to hand transplanting.

RECOMMENDATIONS

SUGAR BEETS, PRE-PLANT -- Apply just prior to planting. See DIRECTIONS FOR USE for methods of application and incorporation. Recommended dosages are as follows: For light textured soils and soils with less than 10% organic matter, apply 40 lbs. and soils with less than 10% organic matter, apply 40 lbs. TILLAM 10-G per acre. For heavy textured soils and soils with over 10% organic matter, apply 60 lbs TILLAM 10-G per acre.

TOBACCO, FLUE-CURED:

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Transplants: TILLAM 10-G may be applied prior to mechanical transplanting only. DO NOT apply TILLAM 10-G prior to hand transplanting.

BEFORE BEDDING AND TRANSPLANTING: Apply TILLAM 10-G broadcast of 40 lbs. per acre. Incorporate immediately with a tandem disc and bed up immediately prior to transplanting, OR

AFTER BEDDING BUT BEFORE TRANSPLANTING: Apply TILLAM 10-G at a broadcast rate of 40 lbs. per acre prior to transplanting, reducing rates proportionately depending upon band width and row spacing. Incorporate immediately, using a power-driven rotary hoe with variable length blades (i.e., one with short blades on the inside and longer blades on the outside). Bed levelers, if used, should be kept shallow, as excessive removal of treated soil will destroy weed control.

TOBACCO, LIGHT AIR CURED: INCLUDES TYPE 31 (Burley) AND TYPE 32 TOBACCOS

Transplants: TILLAM 10-G may be applied prior to mechanical transplanting only. DO NOT apply TILLAM 10-G prior to hand transplanting.

BEFORE TRANSPLANTING: Apply TILLAM 10-G broadcast at 40 lbs. per acre. Incorporate immediately, only with a tandem disc on flat ground followed by transplanting. For band treatment, reduce rates proportionately depending upon band width and row spacing. Incorporate immediately, using a power-driven rotary hoe.

TOMATOES: See DIRECTIONS FOR USE for methods of application and incorporation.

Transplants: TILLAM 10-G may be applied prior to mechanical transplanting only. DO NOT apply TILLAM 10-G prior to hand transplanting.

DIRECT SEEDED, LAYBY: Apply TILLAM 10-G to clean cultivated soils. Do not apply within eight (8) days of harvest. For light textured soils and soils with less than 10% organic matter, apply 40 lbs. TILLAM 10-G per acre. For heavy textured soils and soils with more than 10% organic matter, apply 60 lbs. TILLAM 10-G per acre.

DIRECT SEEDED, PRE-PLANT (CALIFORNIA only): Apply TILLAM prior to planting. For light textured soils and soils with less than 10% organic matter, apply 40 lbs. TILLAM 10-G per acre. For heavy textured soils and soils with more than 10% organic matter, apply 60 lbs. TILLAM 10-G per acre.

TOMATO TRANSPLANTS (Do not use hotcaps):

Transplants: TILLAM 10-G may be applied prior to mechanical transplanting only. DO NOT apply TILLAM 10-G prior to hand transplanting.

BEFORE TRANSPLANTS -- Apply TILLAM 10-G prior to transplanting. **OR AFTER TRANSPLANTING --** Apply TILLAM 10-G to clean cultivated soil. Do not apply within eight (8) days of harvest. For light textured soils and soils with less than 10% organic matter, apply 40 lbs. TILLAM 10-G per acre. For heavy textured soils with more than 10% organic matter, apply 60 lbs. TILLAM 10-G per acre.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

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 bag into application equipment. Then dispose of empty bags in a sanitary landfill or by incineration, or, if allowed by State or local authorities, by burning. If burned, stay out of smoke.

NOTICE - READ CAREFULLY

CONDITIONS OF SALE: Stauffer (and seller) offer(s) this product for sale subject to, and buyer and all users are deemed to have accepted, the following conditions of sale and warranty which may only be varied by written agreement of a duly authorized representative of Stauffer.

WARRANTY LIMITATION: Stauffer warrants that this product conforms to the chemical description in the directions for use on the label subject to the inherent risks referred to below. Stauffer makes no other express warranties: **THERE IS NO IMPLIED WARRANTY OF MERCHANTABILITY** and there are no warranties which extend beyond the description on the label hereof.

INHERENT RISK: The directions for use of this product are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks associated with use. Buyer assumes all risks associated with use or application of this product contrary to label instructions or resulting from extraordinary weather conditions.

LIMITATION OF LIABILITY: In no case shall Stauffer be liable for special, indirect or consequential damages resulting from the use or handling of this product and no claim of any kind shall be greater in amount than the purchase price of the product in respect of which such damages are claimed.