

PM25

10182-177

109 File



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

MAR 31 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. 10182-177  
RO-NEET 10 G

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

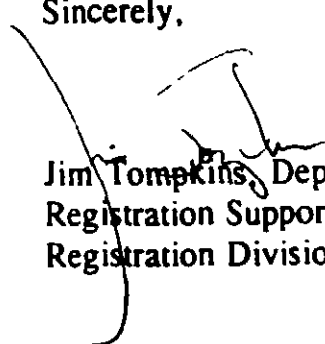
Submit the final printed labeling via the U.S. Postal Service to:

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.10182-177  
RO-NEET 10 G

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)

RO-NEET® 10-G  
Granules-Selective Herbicide For Sugar Beets

**ACTIVE INGREDIENT:**

S-ethyl cyclohexylethylthiocarbamate ..... 10%

**INERT INGREDIENTS:**

..... 90%  
100%

Contains 10 lbs. Active Ingredient per 100 pounds

Keep Out of Reach of Children

**CAUTION**

**STATEMENT OF PRACTICAL TREATMENT**

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAR 3 1979

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

— 10182-197 —

If a known exposure occurs or is suspected, immediately initiate the recommended procedures below. If further treatment is required, contact a Poison Center, a physician, or the nearest hospital.

**IF SWALLOWED:** Immediately give several glasses of water and induce vomiting by gagging the victim with a finger placed on the back of the victim's tongue. Give fluids until vomitus is clear. If victim is unconscious, do not induce vomiting or give anything by mouth.

**FOR EYE CONTACT:** Hold eyelids apart and flush eyes with large amounts of running water for 15 minutes. Seek medical attention if eye irritation occurs.

**FOR SKIN CONTACT:** Flush affected areas with plenty of water for several minutes. Seek medical attention if skin irritation occurs.

**IF INHALED:** Remove to fresh air. Seek medical attention if respiratory irritation occurs or if breathing becomes difficult.

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: United States of America.

EPA Est. No. 476-  
EPA Reg. No. 476-1978

50 lbs. Net. Wt.

A-1R

Made in U.S.A. by

STAUFFER CHEMICAL COMPANY  
Westport, CT 06881-0850

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HARMFUL IF SWALLOWED. Avoid contact with skin, eyes and clothing. Avoid breathing dust. ~~Wear goggles, rubber gloves and protective clothing. Wash thoroughly after handling.~~

#### 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.

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#### 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.

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ENVIRONMENTAL HAZARDS: Keep out of lakes, ponds and streams. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to water or wetlands.

In case of emergency, call collect, day or night, Pesticide Team Safety Network (800) 424-9300 or Stauffer Chemical Company (203) 226-6602.

### GENERAL USE PRECAUTIONS

READ ALL LABEL DIRECTIONS BEFORE USING.

RO-NEET 10-G should be used only at recommended rates (DO NOT OVERDOSE). Applied according to directions, and under normal growing conditions RO-NEET 10-G will not harm the treated crop. During germination and early stages of growth, unusually cold, and wet or hot and dry weather, insect or plant disease attack, the use of certain soil applied systemic insecticides, improperly placed fertilizers or soil insecticides may create abnormal conditions that will weaken crop seedlings. RO-NEET 10-G used under these abnormal conditions could result in crop injury RO-NEET 10-G may cause crop injury on very light sandy soil.

Do not apply in combination with fertilizers, insecticides or fungicides.

Use equipment which has been proven to incorporate thoroughly to the recommended depth.

### WEEDS CONTROLLED

#### ANNUAL GRASSES:

Annual Bluegrass	(Poa annua)
Annual Ryegrass	(Lolium multiflorum)
Barley, Volunteer	(Hordeum spp.)
Barnyardgrass (Watergrass)	(Echinochloa spp.)
Crabgrass	(Digitaria spp.)
Foxtails (Yellow, Green, Giant)	(Setaria spp.)
Wild Oats	(Avena fatua)

#### ANNUAL BROADLEAF WEEDS:

Black Nightshade	(Solanum nigrum)
Hairy Nightshade (Ground Cherry)	(Solanum villosum)
Henbit (deadnettle)	(Lamium spp.)
Lambsquarter	(Chenopodium album)
Nettleleaf Goosefoot	(Chenopodium murale)
Purslane	(Portulaca oleracea)
Redroot Pigweed	(Amaranthus retroflexus)
Shepherdspurse	(Capsella bursa-pastoris)
Small Stinging Nettle (Burning Nettle)	(Urtica urens)

The above listed broadleaf weeds will be controlled only if the application is made when conditions are favorable for germination. RO-NEET 10-G will not control established weeds.

#### PERENNIAL WEEDS:

Yellow Nutgrass (Nutsedge)	(Cyperus esculentus)
Purple Nutgrass (Nutsedge)	(Cyperus rotundus)

Existing stands of nutgrass must be turned under and chopped thoroughly before treatment. Prior to planting, RO-NEET 10-G must be thoroughly mixed into the soil.

### 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.

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## 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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**SOIL PREPARATION:** Prepare the soil for seeding according to good agricultural practice. All weed growth should be thoroughly worked into the soil before treatment. DO NOT APPLY BEFORE PRE-IRRIGATION.

**APPLICATION:** Apply RO-NEET 10-G to well-worked soil which is dry enough to permit thorough incorporation. Apply uniformly the recommended rate of RO-NEET 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 RO-NEET 10-G dosage above recommended limits because plant injury may occur.

**SOIL (MIXING) INCORPORATION APPLICATION:** Immediately (within minutes) after application, thoroughly mix RO-NEET 10-G into the soil to a depth of two to three (2-3) inches. Thorough soil mixing is necessary for good weed control.

## INCORPORATION EQUIPMENT

For Broadcast (Over-All) Application

- A. HOODED POWER-DRIVEN ROTARY TILLER - Set teeth close enough together so all soil is picked up. Uniformly mix to a depth of two to three inches.

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- B. DISC - Mix to a depth of two to three inches by setting tandem or offset discs at four to six-inch depth. On heavy and medium soils, cross disc (disc twice at right angles). On light soils, disc once followed by harrowing for additional mixing and to level the seed bed.

**For Band (Row) Application: Uniformly mix to a depth of two to three inches.**

- A. HOODED POWER-DRIVEN ROTARY TILLERS.
- B. HOODED GROUND-DRIVEN ROTARY TILLERS.

**ROLLING - Under most conditions, the treated area should be firmly rolled between the incorporation unit and the planters.**

**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 RO-NEET 10-G over the seed row and cause crop injury.

**CULTURAL PRACTICES FOLLOWING APPLICATION**

RO-NEET 10-G is not a persistent chemical in the soil and susceptible weeds germinating late in the season and will probably not be controlled.

Cultivate to control those susceptible weeds that escape control by treatment as well as those weeds not susceptible to RO-NEET 10-G.

Should cultivation be desirable at any time following application, maximum weed control will be obtained by cultivating shallow, i.e., no deeper than depth of treatment. For banded treatments, use shields to prevent the movement of untreated soil into the treated row.

**RECOMMENDATIONS**

**FOR CONTROL OF WEEDS LISTED IN CROP SHOWN BELOW.  
 SOLID BROADCAST TREATMENT:**

CROP	WHEN TO APPLY	DOSAGE LBS./ACRE	REMARKS
SUGAR BEETS	Pre-Plant	30-40	Use on mineral soils ONLY. Use lower rate on sandy soils. Use higher dosage rate in heavier soils.

**BAND APPLICATION:** The rates given above are for solid coverage basis. For band application, reduce the amount of RO-NEET 10-G proportionately dependent upon the row



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spacing and band width to be treated. Do not use band application on rocky ground because thorough incorporation is not possible.

### STORAGE AND DISPOSAL

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

#### Pesticide Disposal

Waste 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 bag(s) in a sanitary landfill or by incineration, or, if allowed by State and 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 on the label and is reasonably fit for the purposes referred to 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 RISKS

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 than the purchase price of the product in respect of which such damages are claimed.