

MAR 24 1986

Ms. L.E. Staiger  
Zoecon Corporation  
A Sandoz Company  
975 California Avenue  
Palo Alto, CA 94304-0859

Dear Ms. Staiger:

Subject: Amended Label (Additional Seed Uses) and Phytoxicity Data  
SPUR® 22EW Insecticide  
EPA Registration No. 20954-127  
Your Letters Dated June 10 and November 5, 1985, January 31  
and February 11, 1986

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all section registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
  - a. As stated in our letter of September 23, 1985, the Precautionary Statement should include the statement "Harmful if swallowed." The reason for this statement was defined in the Agency March 1983 review of the acute toxicity studies for MAVRIK Aquaflo® Insecticide, EPA Registration No. 20953-123. In that review, we agreed with your conclusions with regard to the categories of toxicity for labeling purposes in all but one instance. You stated that the category of toxicity for oral ingestion is category 4 as based upon the male acute oral LD<sub>50</sub> and the combined value for males and females. The Agency has taken exception to this conclusion since you have

50452:Heyward:LR-2:KENCO:1/30/86:3/10/86:TAR:VO

R:50552:Heyward:LR-2:KENCO:3/18/86:3/27/86:dej:VO

SYMBOL	SURNAME	DATE						

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chosen to ignore the AOLD<sub>50</sub> value for females which was 2.02 (0.57 to 7.14) gm/kg. The Agency has, however, recognized this value and has chosen to be conservative in the labeling requirement for oral ingestion. The Agency has therefore placed the category of toxicity for the oral hazard into category 3 and is requiring the following precautionary statement to be included on the label: Harmful if swallowed. Also reinstate the appropriate Statement of Practical Treatment as it appeared on your labeling accepted January 16, 1984.

Since the ingredients in this product are identical/similar to Aquaflo<sup>®</sup>, the same labeling requirement applies to this product. We also suggest that you update the labeling for Aquaflo<sup>®</sup> (20954-123).

- b. The statement on the front panel "And certain crops grown, etc. . . ." should be modified to read "And certain crops listed on back of label grown for planting seed."
- 3. In regard to the phytotoxicity information submitted on June 10, 1985 for the subject product, the Agency has concluded that the data provided is in summary form only and does not meet the requirements outlined in Subdivision J of the Guidelines. Therefore, this still remains an outstanding data gap. Please review Subdivision J of the Guidelines and submit appropriate data.
- 4. Please refer to paragraph (2) of our January 13, 1986 letter. Results of this test will determine if a "If inhaled" Statement of Practical Treatment is required. Please indicate when this study will be submitted.
- 5. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

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

Sincerely yours,

George T. LaRocca  
Product Manager (15)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

Enclosure

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ACCEPTED  
with COMMENTS  
by EPA Letter Date:

PRODUCT CODE 6123-04

MAR 24 1986

SPUR® 22 EW  
INSECTICIDE

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
20954-127

For Use on Nonbearing Fruit & Nut Trees and Vines and  
Certain Crops Grown for Planting Seed.

ACTIVE INGREDIENT:

(αRS, 2R)-fluvalinate [(RS)-α-cyano-3-phenoxybenzyl  
(R)-2-[2-chloro-4-(trifluoromethyl)anilino]-3-methyl-  
butanoate]\*.....22.3%

INERT INGREDIENTS:.....77.7%

SPUR 22 EW is a 22.3% w/w (αRS, 2R)-fluvalinate emulsion in water.

\*U.S. PAT. 4,260,633 and 4,411,912.  
SPUR 22 EW is a trademark of Sandoz, Ltd.

EPA Registration No. 20954-127  
EPA Est. No. 20954-CA-1

KEEP OUT OF REACH OF CHILDREN

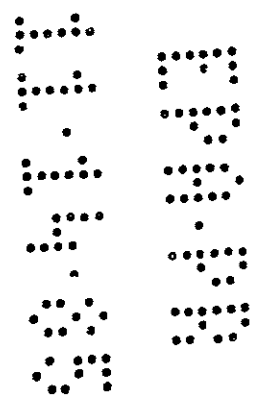
CAUTION

See back panel for additional precautionary statements and first aid.

SHAKE WELL BEFORE USING

ZOECON CORPORATION  
CROP PROTECTION DIVISION  
Palo Alto, California 94304  
A Sandoz Company

NET CONTENTS:



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS

CAUTION

Avoid breathing spray mist. To avoid potential irritation of nose and throat from fine spray particles, use a NIOSH approved respirator equipped with an organic vapor/pesticide cartridge and dust and mist prefilter. Causes mild eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wear rubber gloves while handling. Wear protective clothing. Wash exposed skin with soap and water after handling and before eating. Wash contaminated clothing with soap and water before reuse.

Sensitive individuals may temporarily experience an itching or burning sensation, with or without a rash, following exposure. Avoid hand or sleeve-to-face contact. Prior to exposure, or after washing, an application of certain vegetable oils may reduce these symptoms.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

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

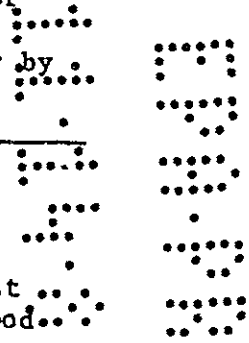
24 Hour Medical or Chemical Emergency Response Phone Number  
(Collect) 415-857-0172

ENVIRONMENTAL HAZARDS

This product is highly toxic to fish. Use with care when applying in areas adjacent to any body of water. Do not apply to lakes, streams or ponds. Do not apply directly to water. Do not apply when weather conditions favor drift from the target area. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL

STORAGE: Store away from direct sunlight or heat. Pesticides must be stored in a secured area away from other products, food or feed. In case of spill or leak, ventilate area well, soak up with soil or other absorbent material. Do not use caustic agents.



PESTICIDE

DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of SPUR 22EW may be disposed of on site or at any approved waste disposal facility.

CONTAINER

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

INTRODUCTION

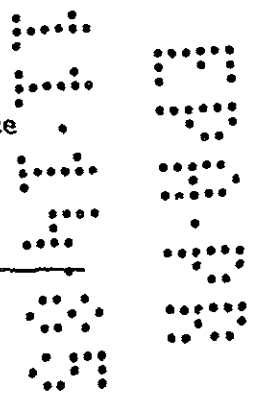
SPUR® 22EW Insecticide controls insects and controls or suppresses mites primarily through contact action. Target pests must be exposed to the spray or spray deposits, so good spray coverage is necessary. Treat according to local action criteria, or when pests are young and populations manageable, before crop damage occurs. Repeat as needed, generally at one to three week intervals. Performance should be apparent four days after treatment. Where heavy populations occur, repeated applications five to seven days apart may be necessary to bring pests under adequate control. Growth dilution, climatic variables and pest habits determine treatment needs.

For most pests listed, a range of use rates is given. The higher rates must be selected when pest pressures or insect damage potential is severe. The more economical rates often give acceptable results.

Dried residues of SPUR are non-toxic and non-repellant to honeybees. Treat during non-foraging periods to minimize potential adverse effects.

Dilute SPUR in sufficient water to give good spray coverage, based on local crop protection experience. Buffer spray water to pH 5-7 if necessary. If local experience encourages use by air, use five to twenty gallons of water per acre. SPUR can be tank-mixed in water with emulsified spray oils. Do not mix with highly caustic or alkaline materials. Check mixtures for physical and biological compatibility before extensive use.

Consult your local Extension office or a Zoecon specialist for guidance in selecting a rate and timing schedule that has demonstrated good performance under your specific conditions.



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For end use only. Do not repackage or reformulate without manufacturer's written approval. See attached leaflet for complete directions for use.

Do not use where any part of the crop will be used for human or livestock consumption. Applications may not be made to trees or vines which will be harvested within one year.

For use in the production of planting seed crops, use SPUR only after seedstalk formation, or during and after bloom. Do not graze animals in treated areas or feed gleanings or crop residues to livestock. Do not replant SPUR treated fields with food crops, except cotton, within 90 days of last application.

SPUR

RECOMMENDED APPLICATION RATES

COMMODITY	PESTS	RATE FL. OZ. /ACRE
PLANTING		
SEED CROPS:		
Beet*	Aphids	3.2 - 6.4
Broccoli	Cabbage seedpod weevil	
Brussel sprouts	Flea beetles	
Cabbage	Diamondback moth	
Carrot	Grasshoppers	
Cauliflower	Imported cabbageworm	
Collard	Loopers	
Kale	Stink bugs	
Lettuce	Webworms	
Onion (Green)	Thrips(1)	
Parsnip		
Radish	Corn earworm	4.8 - 6.4
Rutabaga*	Tobacco budworm	
Spinach		
Sugar beet*	Armyworms(1)	4.8 - 9.6
Turnip*	Cutworms	
Swiss Chard	Lygus plant bugs(1)	
Tobacco	Spider mites	
Non-bearing (fern stage) Asparagus*	Asparagus aphid Asparagus beetle Thrips Cutworms (climbing)	3.2 - 6.4 6.4

(1) To control populations known to be tolerant of other insecticides, select the higher rates and use shorter intervals.

\*Except in California

RECOMMENDED APPLICATION RATES

COMMODITY	PESTS	RATE <sup>(2)</sup> FL. OZ./100 GAL.
NONBEARING FRUIT TREES, NUT TREES & VINES	Aphids	3 - 8
	Grape leaffolder	
	Gypsy moth	
	Japanese beetle	
	Leafhoppers	
	Leafrollers,	
	Leaf feeding caterpillars	
	Oriental fruit moth	
	Peach twig borer	
	Scales (crawler stage)	
Spotted Tentiform leafminer		
Thrips	5 - 8	
Lygus bugs <sup>(1)</sup>		
Pear psylla <sup>(1)</sup>		
Spider mite		

(2) Rate is for full coverage, dilute applications. For concentrate sprayers, calculate the per acre rate needed dilute and use that amount of product per acre in a reduced gallonage of water carrier.

WARRANTY AND CONDITIONS OF SALE

Zoecon Corporation warrants that the composition of this product conforms to the description on the label and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use. Zoecon makes no other warranty, express or implied, concerning the use of this product other than as indicated on the label. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given on the label.

(0914m)

