12056 -23

331/2003



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAR 3 1 2003

Jeffrey S. Hartman Technical Services Manager Trace Chemicals LLC 2320 Lakecrest Drive Pekin, IL 61554-6637

Subject: STILETTO EPA Reg. No. 42056-23 Your amendment dated March 3, 2003

Dear Mr. Hartman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

PRECAUTIONARY STATEMENTS - Personal Protective Equipment: Change "waterproof gloves" to "chemical resistant gloves made of waterproof material."

ENVIRONMENTAL HAZARDS:

In next to last sentence, change "This chemical" to "Metalaxyl"

In last sentence, change "chemical" to "product"

AGRICULTURAL USE REQUIREMENTS: In last sentence, change "waterproof gloves" to "chemical resistant gloves made of waterproof material."

STORAGE AND DISPOSAL - third line: Add the word "Pesticide" before the word "Storage"

DIRECTIONS FOR USE - Rates - Soybeans:

In first sentence, insert a space between "seed" and the following parenthesis.

In second sentence, delete "On soybeans," - capitalize "do"

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DIRECTIONS FOR USE - Rates - Wheat, Barley, Oats: insert a space before each left parenthesis (4 instances)

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

Please note that the First Aid section must appear on the front panel of the printed label. Please submit one (1) copy of the final printed label before you release the product for shipment.

If you have any questions, please call Robert Westin at (703) 305-5721.

Sincerely,

Mary L. Walles

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

Enclosure



STILETTO

Vitavax-Thiram-Metalaxyl Seed Treatment

ACCEPTED with COMMENTS In EPA Letter Dated:

MAR 3 1 2003

| Active Ingredients: Carboxin (5,6-Dihydro-2-methyl-N-phenyl-1,4-oxathiin -3-carboxamide) Thiram (Tetramethylthiuram disulfide) | Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 42,056-10.00% |
|---|--|
| Thiram (Tetramethylthiuram disulfide) | 10.00% |
| Metalaxyl N-(2,6-dimethylphenyl)-N-(methoxyacetyl) | |
| alanine methyl ester | 1 62% |
| inert ingredients | 78.38% |
| inert ingredients | 100.00% |

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Do not get on skin or on clothing, Avoid contact with eyes. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Personal Protective Equipment

Applicators and other handlers must wear: long-sleeved shirt and long pants, shoes plus socks, waterproof gloves and 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.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. IF ON SKIN OR CLOTHING: 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 INHALED: Move person to fresh air. If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. IF IN EYES: Hold eye open and rinse slowly and gently with water 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eve. Call a poison control center or doctor for treatment advice.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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 or rinsate. Exposed treated seed may be hazardous to birds and other wildlife. Collect or incorporate seed that are spilled during loading or are visible on soil surface in turn areas. Dispose of all treated seed by burial away from bodies of water. Groundwater Advisory: This chemical is known to leach through soil into groundwater under certain conditions as a result

of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

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.

EPA REG. NO. 42056-23 EPA EST. NO. 42056-IL-1

Net Contents: 2.5 gallons

0.01

Manufactured by: TRACE CHEMICALS LLC Pekin, Illinois 61554

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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and 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. Do not enter or allow worker entry into treated areas during the restricted entry interval. (REI) of 24 hours. Exception: if the seed is treated with the product and the treated seed is aoil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated areas 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.

Directions For Use

Stiletto seed treatment is a ready-to-use product. Apply as a pour-on hopper-box application or through an on-farm seed treatment equipment. Stiletto seed treatment combines the systemic action of carboxin and metalaxyl with the surface action of thiram to control certain seed rot/seedling blight diseases including *Pythium*, *Rhizoctonia*, *Fusarium* and *Helminthosporium*. Fill planter box or mixing vessel with seed, pour the required amount of Stiletto seed treatment evenly on top of seed. Stir thoroughly with a stick or paddle so that all seeds are covered.

Rates:

Soybeans: Use 4.0 fl. oz. of Stiletto seed treatment per bushel of seed(6.7 fl. oz. per 100 lbs. of seed). On soybeans, do not graze or feed livestock on forage and hay on treated areas.

Rice: Use 5 to 6.8 fl. oz. Stiletto seed treatment per 100 lbs. of seed. The higher rate is recommended for control of *Helminthosporium oryzae*. Do not graze or feed livestock on treated areas for six weeks after planting.

Cotton: Use 11 to 13.5 fl. oz. Stiletto seed treatment per 100 lbs. of seed. Stiletto seed treatment can be used on both machine and acid delinted cotton.

Wheat, Barley, Oats: Stiletto seed treatment also provides protection on barley from loose smut(Ustilago nuda) and covered smut(Ustilago hordei) and protection on wheat from loose smut(Ustilago tritici) and common bunt(Tilletia caries). Use 5 to 6.8 fl. oz. of Stiletto seed treatment per 100 lbs. of seed. Do not graze or feed livestock on treated areas for six weeks after planting.

Use Restrictions

Treated seed must not be used for or mixed with food or animal feed, or processed for oil. Treat only those seed needed for immediate use, minimizing the interval between treatment and planting. Do not store excess treated seed beyond planting time. Note: Regularly inspect planter plates and mechanisms and clean as required for proper seeding. At the end of each day of use, clean out the electric eye monitors according to the manufacturer's directions.

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited. Do not reuse empty containers.

Storage: Store in a cool dry location. Do not store at temperatures below 32°F.

Pesticide Disposal: Pesticide wastes are toxic. 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.

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.

NOTICE - READ CAREFULLY

CONDITIONS OF SALE AND LIMITED WARRANTY STATEMENT

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Trace chemicals LC no claims are made to guarantee germination of carry-over seed. As its sole express warranty, Trace Chemicals LC warrants that this product conforms to the chemical description on the label and is reasonably fit for purposes stated on the label only when used in accordance with directions and instructions specified on the label, subject to the inherent risks set forth above. ONLY AS PERMITTED BY APPLICAPLE 2/XW, IN THE EVENT OF A BREACH OF THIS LIMITED WARRANTY, TRACE CHEMICALS, INC. SHALL NOT BE LIABLE FOR CONSEQUENTIAL DAMAGES. SUBJECT TO APPLICABLE LAW, TRACE CHEMICALS, INC. NEITHER MAKES 110R AUTHORIZES ANY OF ITS AGENTS OR REPRESENTATIVES TO MAKE ANY WARRANTY OF FITNESS OR MERCHANTABILITY, GUARANTY OR REPRESENTATION, EXPRESS OR IMPLIED, CONCERNING THIS MATERIAL. Buyer assumes the responsionity to handle, use and store this product in accordance with the safety instructions and use directions contained on the label. Buyer/User purchases this product subject to the foregoing Conditions of Sale and Limited Warranty, which, subject to applicable law, may be varied only by written agreement signed by a duly authorized representative of Trace Chemicals LLC. If these terms are not acceptable, return all products to the place of purposes, such as a product bio to the place of purchase, unopened for a full refund.