



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 16, 2015

Frederick T. Smith
Agent for Luxembourg-Pamol, Inc.
SciReg, Inc.
12733 Director's Loop
Woodbridge, VA 22192

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment –
Amendment to revise the product descriptor and the Directions For Use.
Product Name: LBG-W
EPA Registration Number: 42519-33
Application Date: 9/24/2015
OPP Decision Number: 510875

Dear Mr. Smith:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration

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process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Cody Kendrick of my team by phone at (703) 347-0468 or via email at kendrick.cody@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Bryceland". The signature is fluid and cursive, with the first name being the most prominent.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

LBG-W

A systemic fungicide for the control of downy mildew, damping off, late blight, root rot, and suppression of bacterial blight in the production of ornamental plants, ornamental bulbs, corms and tubers, vegetables and vegetable plants grown in greenhouses and nurseries (including field and container grown plants grown outdoors and in shade houses, lath houses and other ornamental production structures) and conifer nurseries

ACTIVE INGREDIENT:

Potassium Phosphate*54.50%

OTHER INGREDIENTS:45.50%

TOTAL100.00%

*Phosphorous acid equivalent: 34.30% (4.2 lbs/gal).

ACCEPTED

11/16/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 42519-33

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

If swallowed	<ul style="list-style-type: none">• Call 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 a poison control center or doctor.• Do not give anything to an unconscious person.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none">• 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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical information.

See inside booklet for additional Precautionary Statements and for Directions for Use.

EPA Reg. No.: 42519-33

Net Contents:

EPA Est. No.: 42519-ISR-002

Manufactured for:

LUXEMBOURG – PAMOL, INC.

3647 Willowbend Blvd., Suite 810

Houston, Texas 77054, U.S.A.

Customer Service (713) 661-8800

Batch No. XXXX-XX

FOR CHEMICAL SPILL, LEAK,
FIRE OR EXPOSURE CALL
TOLL FREE: 1-800-424-9300

AGRICULTURAL CHEMICAL
DO NOT SHIP OR STORE WITH FOODS,
FEEDS, DRUGS OR CLOTHING

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals:

CAUTION. Harmful if swallowed or if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- long-sleeved shirt and long pants
- waterproof gloves
- shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 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 highwater mark. Do not contaminate water when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirements specific to your State or Tribe, consult the State or tribal agency responsible for pesticide regulation. 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.

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 protective equipment (PPE), and restricted entry intervals (REI). 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 of 4 hours unless wearing appropriate PPE.

PPE requirement 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

Chemigation:

General Chemigation Information

1. Apply this product only through drip (trickle), microjet, center pivot, solid set, hand move, or moving wheel irrigation system that does not contain aluminum components.
Do not apply this product through any other type of irrigation system.
2. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
3. If you have questions about calibration, contact State Extension Service specialists, equipment manufacturers or other experts.
4. 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.
5. 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.
6. Equip the pesticide supply tank with a means for continuous agitation either recirculation or mechanical agitator. Fill the supply tank with the appropriate amount of water and add the LBG-W slowly followed by any other products that are compatible and labeled for chemigation. Observe all cautions and limitations on the label of all products used in the mixtures. For fixed position irrigation systems such as center pivot etc., apply the pesticide toward the end of the irrigation cycle. Exact timing will depend upon the desired LBG-W application rate and the calibration of the system. For moving systems, apply the LBG-W continuously. In all cases, maintain thorough coverage of the crop.

For Chemigation Systems Connected to Public Water Systems:

1. Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.
2. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, back flow preventer (RPZ), or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the reduced-pressure zone, discharge the water from the public water system into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the flow outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.
3. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection.
4. The pesticide injection pipeline must 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.
5. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. 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.

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

For Drip (Trickle) Chemigation and Sprinkler Chemigation Systems:

1. 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 back flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. 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.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. 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.
6. 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.
7. Do not apply when wind speed favors drift beyond the area intended for treatment.

Product Information:

LBG-W is a systemic product, which contains phosphorous acid. Phosphorous acid is effective in prevention and control of diseases by activation of the plants' natural resistance mechanism, as well as by direct activity on the fungus. LBG-W is intended for use as part of an Integrated Pest Management (IPM) system. When used in conjunction with good cultural management practices and as part of a complete disease control program, LBG-W will control downy mildew, damping off, root rot and late blight, and suppression of bacterial blight in the production of ornamental plants, ornamental bulb, corm and tuber crops, vegetables and vegetable plants grown in greenhouses and nurseries (including field and container grown plants grown outdoors and in shade houses, lath houses and other ornamental production structures and conifer nurseries. In order to achieve maximum results in controlling the listed diseases, treatments should be initiated when environmental conditions are favorable for disease development.

Under periods of high disease pressure, LBG-W may be tank-mixed and/or used in rotation with other fungicides, such as Heritage® Fungicide, Micora™ Fungicide or Subdue MAXX® Fungicide, per label directions, for improved disease control.

Mixing Instructions:

Fill spray tank halfway with clean water. Add the required amount of LBG-W to the tank as indicated in Table 1. While agitating, add the remaining amount of water.

Avoid mixing LBG-W with products that are either strongly acidic (pH < 5.5) or strongly alkaline (pH > 7.8).

Compatibility:

LBG-W is believed to be compatible with most commonly used pesticides. Consult specific product labels for additional information. Conduct a tank spray compatibility test when you plan to mix this product with other products. To determine the physical compatibility of this product with other products, use a jar test. Using a quart jar, add the proportionate amounts of the products to approximately one quart of water with agitation. Add dry formulations first, followed by flowables, and then emulsifiable concentrates last. After thorough mixing, allow this mixture to stand for 5 minutes. If the combination remains mixed or can be readily remixed, it is physically compatible. Once compatibility has been proven, use the same procedure for adding products to the spray tank.

LBG-W and LBG-W tank-mix combinations have been evaluated for phytotoxicity on a large variety of crops under normal greenhouse and nursery conditions. However, testing all plant species in all mixtures and combinations is not feasible. Test a small portion of the area to be treated for phytotoxicity, before treating the entire area.

When tank mixing LBG-W with another registered plant protection product, follow the more restrictive labeling requirements of any tank mix partner. Do not tank mix with products whose label prohibits tank mixing.

Important:

Do not apply on plants when they are under water stress, or during severe weather conditions such as high or very low temperatures. Begin spraying when environmental conditions are favorable for the development of disease or as indicated below.

Application Instructions:

Apply spray solution directly to foliage and drench solutions to the growing media surface, unless directed otherwise in Table 1. Make foliar applications in sufficient water to ensure thorough plant coverage.

Unless specified, there is no limit to the number of applications. When applying LBG-W, be sure the spray solution has a **pH between 5.5 and 7.8** to limit the possibility of phytotoxicity to the crop, and that it is applied in sufficient water (> **30 gal/acre** for foliar applications to small fruits and vegetables).

Use the higher listed application rate when conditions favor disease development and/or with increased disease pressure.

Use Restrictions

Do not apply higher than the listed application rates.

Do not apply LBG-W with fertilizers in the spray solution.

Table 1. Use Rates.

CROP	DISEASE	RATE/100 gal.	REMARKS
Brassica vegetables, such as, broccoli, cabbage, cauliflower, kale, mustard greens	<i>Pythium</i> spp.	0.75 to 1.5 pints	Drench*
	Downy mildew	4 pints	Make preventative foliar applications on a 7 day interval.
Bulb vegetables, such as, garlic, onion, shallot	<i>Pythium</i> spp.	0.75 to 1.5 pints	Drench*
	Downy mildew	4 pints	Make preventative foliar applications on a 7 day interval.
Citrus seedlings Note: Do not apply before or after a severe pruning.	Phytophthora root rot	2 gallons	Drench using 0.5 pint per square foot of bench every 2 months. Do not tank-mix with other products.
Conifers	<i>Pythium</i> spp. <i>Phytophthora</i> spp.	4 pints	Pre-plant dip. Thoroughly wet the root mass and plant. Apply foliar applications up to run-off every 4 to 6 weeks.
Cucurbits, such as cucumber, melon, squash, pumpkin	<i>Pythium</i> spp.		Drench*
	Downy mildew		Make preventative foliar applications on a 7day interval a protectant fungicide, such as Micora Fungicide or Mancozeb
Fruiting vegetables, such as, eggplant, tomato, pepper	<i>Pythium</i> spp.	0.75 to 1.5 pints	Drench*
	Late blight Bacterial blight - <i>Xanthomonas</i> spp.	4 pints	Make preventative foliar applications on a 7 day interval. Suppression of bacterial diseases may be improved when LBG-W is applied in a tank-mix with Kocide® 3000 and Mancozeb.

Herbs and Spices	<i>Pythium</i> spp. <i>Phytophthora</i> spp.	0.75 to 1.5 pints	Drench* Apply as needed on a 7 to 21 day interval.
	Downy mildew	4 pints	Make preventative foliar applications on a 7 day interval. Due to the numerous kinds of herbs and spices, it is recommended that a phytotoxicity trial be initiated on a limited area of the crop prior to treating the entire crop.
Leafy vegetables , such as, lettuce, spinach	<i>Pythium</i> spp.	0.75 to 1.5 pints	Drench*
	Downy mildew	4 pints	Make a preventative foliar application at the 2-leaf stage. Repeat applications on a 7 day interval. During periods of high disease pressure, you may apply LBG-W in a tank-mix with Micora Fungicide for improved disease control.
Strawberry	<i>Pythium</i> spp. Phytophthora leather rot, or Red steale	4 pints	Pre-plant dip – thoroughly wet the root mass. Make foliar applications on a 14 to 28 day schedule.
Ornamentals Breeding Crops Bulb, corm and Tuber Crops	<i>Pythium</i> spp. <i>Phytophthora</i> spp.	0.75 to 1.5 pints	Drench*

Conifers Christmas Trees Cut Flowers Evergreens, including Conifers Flowering Plants Foliage plants Ground Covers Perennial Plants Pot and Bedding Plants Shrubs Trees**, including non- bearing fruit and nut trees. Vines**, non-bearing.	<i>Pythium</i> spp. <i>Phytophthora</i> spp.	2 to 4 pints	Make preventative foliar applications on a 7 day interval. Apply no greater than 400 gallons of spray solution per acre. During periods of high disease pressure, LBG-W may be applied in a tank-mix with Heritage Fungicide or Micora Fungicide for improved disease control.
	Downy mildew	4 pints	Make preventative applications on a 7 day interval. Apply no greater than 400 gallons of spray solution per acre. During periods of high disease pressure, you may apply LBG-W in a tank-mix with Heritage Fungicide, Micora Fungicide or Subdue MAXX Fungicide for improved disease control.
	Bacterial blight - <i>Xanthomonas</i> spp.	4 pints	Preventative foliar applications on a 7 day schedule will provide disease suppression.

Preharvest interval (PHI) for LBG-W for all listed fruit and vegetable crops is 0 days.

***Drench applications:**

- **Apply 1 to 2 pints of drench solution per square foot of surface or growing area unless directed otherwise.**
- **For small seedlings growing in flats and trays, apply 0.75 pints of drench solution per square foot of surface or growing area.**

****Non-bearing fruit and nut trees and vines are plants that will not bear edible fruit or nuts for one year after application.**

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a dry, cool place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying.

Container sizes of 5 gallons or less: Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Container sizes of greater than 5 gallons: Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

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.

Warranty Limitations and Disclaimer

To the extent consistent with applicable law, Luxembourg warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. Luxembourg EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. To the extent consistent with applicable law, buyer assumes all risk of use of this material when such use is contrary to label instructions. Read and follow the label directions carefully.

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