

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 16, 2020

Carolyn Miter Registration Specialist Albaugh, LLC P.O. Box 2127 Valdosta, GA 31604

Subject: Label Amendment – Correction of error in Ingredient Statement, addition of claim

Product Name: ST Pre-mix #6

EPA Registration Number: 42750-324

Application Date: 04/03/2019 Decision Number: 550000

Dear Ms. Miter:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing 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 copy of the final printed labeling before you release the 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 the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 process. Therefore, should the Agency 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.

Page 2 of 2 EPA Reg. No. 42750-324 Decision No. 550000

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact me by phone at 703-305-5410, or via email at johnson.hope@epa.gov.

Sincerely,

Maryam K. Muhammad, Acting Product Manager 21

Fungicide Branch

Registration Division (7505P)

Office of Pesticide Programs

Enclosure

# ST PRE-MIX #6

[Alternate Brand Name CEREAL PREMIX F4 RTU ST]

A fungicide seed treatment for control of specified diseases of barley, oats, triticale, wheat and spring wheat

Alternate Marketing Statement: [Seed Care]

# **ACTIVE INGREDIENTS:**

Difenoconazole*	3.37%
Metalaxyl**:	3.64%
Thiabendazole***	
Tebuconazole****	
OTHER INGREDIENTS:	90.58%
TOTAL:	100.00%

\*CAS No. 119446-68-3 \*\*CAS No. 57837-19-1 \*\*\*CAS No. 148-79-8 \*\*\*\*CAS No. 107534-96-3 ACCEPTED

Mar 16, 2020

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

42750-324

Contains 0.29 pound active ingredient of difenoconazole, 0.31 pound active ingredient of metalaxyl, 0.16 pound active ingredient thiabendazole, and 0.05 pound active ingredient of tebuconazole per gallon.

# KEEP OUT OF REACH OF CHILDREN

# **CAUTION**

	FIRST AID	
IF ON SKIN OR CLOTHING:	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>	
NOTE TO PHYSICIAN: If ingested, induce emesis and treat symptomatically.		
HOT LINE NUMBER: Have the product container or label with you when calling poison control center or doctor, or going for treatment. For 24- Hour Emergency Assistance spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.		

See additional precautionary statements and directions for use inside booklet.

EPA REG. No. 42750-324

EPA EST. No. xxxxxx-xxx

MANUFACTURED BY: Albaugh, LLC Ankeny, IA 50021

# PRECAUTIONARY STATEMENTS

# HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear long-sleeved shirt and long pants, socks and shoes, and chemical-resistant gloves made of any waterproof material. Wash thoroughly with soap and water after handling.

# PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material.

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.

#### **ENGINEERING CONTROL STATEMENTS**

When handlers use closed systems or enclosed cabs 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/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

## PHYSICAL AND CHEMICAL HAZARDS

Do not allow contact with oxidizing agents. Hazardous chemical reaction may occur.

## **ENVIRONMENTAL HAZARDS**

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, 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 wash waters or rinsate.

If treated seed is spilled outdoors or in areas accessible to birds, promptly clean up or bury to prevent ingestion.

Ground Water Advisory: Metalaxyl and Tebuconazole are known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground-water contamination.

# **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 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 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 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, wear:

- Coveralls
- Socks plus shoes
- Chemical-resistant gloves made of any waterproof material

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR DISEASE CONTROL, AND/OR ILLEGAL RESIDUES.

# PRODUCT INFORMATION

ST PRE-MIX #6 is a systemic seed treatment that controls or suppresses certain seed borne, soil borne, and early season foliar diseases of wheat, barley, oats and triticale. It is a mixture of difenoconazole, metalaxyl, thiabendazole and tebuconazole. ST PRE-MIX #6 provides Pythium damping-off activity and provides activity on the remaining diseases claimed on this label. An EPA approved coloring agent has been added to the formulation.

# RESISTANCE MANAGEMENT

ST Pre-Mix #6 contains four active ingredients from the following fungicide groups.

- Difenoconazole is classified as a Target Site of Action Group 3 fungicide.
- Thiabendazole is classified as a Target Site of Action Group 1 fungicide.
- Tebuconazole is classified as a Target Site of Action Group 3 fungicide.
- Metalaxyl is classified as a Target Site of Action Group 4 fungicide.

Due to the minimal amount of ST Pre-Mix #6 applied to the seed that relocates to the upper parts of the plant and the multiple modes of action, the potential for development of resistance is reduced. Seed treatments of ST Pre-Mix #6 can therefore be followed by foliar use and resistance management guidelines of foliar use fungicides containing the same modes of action as specified on the respective labels.

#### Resistance Management Recommendations

ST Pre-Mix #6 contains four active ingredients with three distinct modes of action. Any fungal population may contain individuals naturally resistant to ST Pre-Mix #6, and other Group 3, Group 4, and Group 1 fungicides. A gradual or total loss of pest control may occur over time if these fungicides are used repeatedly

in the same fields. Other resistance mechanisms that are not linked to site of action but specific for individual chemicals, such as enhanced metabolism, may also exist.

Appropriate resistance-management strategies should be followed. To delay the development of fungicide resistance:

- 1. Applications Adhere to the label use directions regarding the consecutive use of ST Pre-Mix #6 fungicide seed treatment or other target site of action Group 3, Group 4, Group 1 fungicides that have a similar site of action on the same pathogens.
- 2. Integrated Pest Management (IPM) Integrate ST Pre-Mix #6 into an overall disease and pest management program. Follow cultural practices known to reduce disease development. Consult your local extension specialist, certified crop advisor and/or Albaugh representative for additional IPM strategies established for your area. ST Pre-Mix #6 may be used in Agricultural Extension advisory (disease forecasting) programs, which recommend application timing based on environmental factors favorable for disease development.
- 3. Monitoring Monitor efficacy of all fungicides used in the disease management program against the targeted pathogen and record other factors that may influence fungicide performance and/or disease development.
- 4. Reporting If a Group 3, Group 4, and/or Group 1 target site fungicide, such as ST Pre-Mix #6, appears to be less or no longer effective against a pathogen that it previously controlled or suppressed, contact a Albaugh representative, local extension specialist, or certified crop advisor to assist in determining the cause of reduced performance.

#### MIXING PROCEDURES

ST PRE-MIX #6 is formulated for commercial and on-farm seed treatment, using standard mechanical slurry- or mist-type seed treatment equipment which accurately meters and mixes a flowable seed treatment. The equipment must provide uniform coverage of ST PRE-MIX #6 on the seed. Uneven seed coverage may not give the desired level of disease control. This product does not require the addition of water for application.

Consult the manufacturer of the application equipment you plan to use for suitability for this application and for instructions on operation and calibration of the equipment.

# Tank Mixtures

Confirm physical compatibility, seed safety, seed safety in stored seed, and biological efficacy before tank mixing with other seed treatment products. This product cannot be mixed with any product containing a label prohibition against such mixing.

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

# USE RESTRICTIONS:

- Green wheat forage may not be grazed until 55 days after planting.
- Green barley forage may not be grazed until 30 days after planting.
- Do not plant any crop other than those on this label within 31 days to fields in which treated seeds were planted.

# SEED BAG LABEL REQUIREMENT

The Federal Seed Act requires that containers containing treated seeds shall be labeled with the following statements:

- This seed has been treated with ST Pre-Mix #6, a fungicide containing difenoconazole, metalaxyl, thiabendazole and tebuconazole.
- Do not use for feed, food or oil purposes.

The U.S. Environmental Protection Agency requires the following statements on containers containing seed treated with ST Pre-Mix #6:

- Store treated seed away from food and feedstuffs.
- Do not allow children, pets or livestock to have access to treated seeds.
- Wear long pants, long-sleeved shirt and protective gloves when handling treated seed.
- Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds spilled during loading and planting.
- Dispose of all excess treated seed by burying seed away from bodies of water.
- Do not contaminate bodies of water when disposing of planting equipment wash water.
- Dispose of seed packaging or containers in accordance with local requirements.
- Excess treated seed may be used for ethanol production if (1) by-products are not used for livestock feed and (2) no measurable residues of pesticide remain in ethanol by-products that are used in agronomic practice.

When using formulations that do not contain dye, to comply with 40 CFR 153.155, all seed treated with an economic poison must be colored with an EPA approved dye such as one of the dyes listed in 40 CFR Sections 180.910 and 180.920 to distinguish and prevent subsequent inadvertent use as a food for man or feed for animals.

# **BARLEY**

Apply ST PRE-MIX #6 to barley seed at the rates given in the following table:

Rate/100 lbs seed	Diseases Controlled	Diseases partially controlled <sup>1</sup>
	General Seed Rots <sup>2</sup>	Early season Common Root Rot
	Covered Smut	(Cochiliobolus spp.)
Г. fl; -l	Pythium Damping Off	Early season Fusarium Root Rot
5 fluid ounces	Loose Smut	Early season Rhizoctonia Root Rot
	Fusarium Damping-Off	Early season suppression of Leaf Rust
		and Powdery Mildew

<sup>&</sup>lt;sup>1</sup>Partial control can either mean erratic control from good to poor, or consistent control at a level below that is generally considered acceptable for commercial disease control.

<sup>&</sup>lt;sup>2</sup>General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

# WHEAT

Rate/100 lbs seed	Diseases Controlled	Diseases partially controlled <sup>1</sup>
	Common Bunt <sup>2</sup>	Early season Common Root Rot
	Dwarf Bunt	(Cochliobolus spp.)
	Flag Smut	Fusarium Seed Scab
5 fluid ounces	Loose Smut	Early season Fusarium Root Rot
5 fluid ourices	General Seed Rots <sup>3</sup>	Early season Rhizoctonia Root Rot
	Pythium Damping-Off	Seed-borne Septoria
	Stinking Smut	Early season suppression of Leaf Rust
	_	and Powdery Mildew

<sup>&</sup>lt;sup>1</sup>Partial control can either mean erratic control from good to poor or consistent control at a level below that generally considered acceptable for commercial disease control.

#### OATS

Rate/100 lbs seed	Diseases Controlled	Diseases partially controlled <sup>1</sup>
	General Seed Rots <sup>2</sup> Covered Smut	Early season Common Root Rot (Cochliobolus spp.)
5 fluid ounces	Loose Smut Pythium Damping-Off Fusarium Damping-Off	Early season Fusarium Root Rot Early season Rhizoctonia Root Rot

<sup>&</sup>lt;sup>1</sup>Partial control can either mean erratic control from good to poor, or consistent control at a level below that is generally considered acceptable for commercial disease control.

#### SPRING WHEAT

Rate/100 lbs seed Diseases Controlled Diseases partially cor	ntrolled <sup>3</sup>
Common Bunt¹ Seed-borne Septoria Loose Smut General Seed Rots² Pythium Damping-Off Fusarium D	Root Rot Root Rot ia Root Rot on of Leaf

<sup>&</sup>lt;sup>1</sup>ST PRE-MIX #6 controls both seed-borne and soil-borne common bunt.

<sup>&</sup>lt;sup>2</sup>ST PRÉ-MIX #6 controls both seed-borne and soil-borne common bunt.

<sup>&</sup>lt;sup>3</sup>General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

<sup>&</sup>lt;sup>2</sup>General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

<sup>&</sup>lt;sup>2</sup>General seed rots controlled include those caused by saprophytic organisms, such as *Penicillium* spp. and *Aspergillus* spp.

<sup>&</sup>lt;sup>3</sup>Partlal control can either mean erratic control from good to poor or consistent control at a level below that generally considered acceptable for commercial disease control.

# **TRITICALE**

Rate/CWT	Diseases Controlled	Diseases partially controlled <sup>1</sup>
5 fluid ounces	General Seed Rots <sup>2</sup> Loose Smut Pythium Damping-Off Fusarium Damping-Off Dwarf Bunt	Early season Common Root Rot (Cochliobolus spp.) Early season Fusarium Root Rot Early season Rhizoctonia Root Rot

<sup>&</sup>lt;sup>1</sup>Partial control can either mean erratic control from good to poor, or consistent control at a level below that is generally considered acceptable for commercial disease control.

#### STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container tightly closed when not in use. Store out of the reach of children.

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 (less than 5 gallons)

Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use and disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available 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.

# CONTAINER HANDLING [greater than 5 gallons]

Refillable container. Refill this container with ST PRE-MIX #6 only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the person refilling. To clean container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available 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 AND DISCLAIMER STATEMENT

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Albaugh, and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the

<sup>&</sup>lt;sup>2</sup>General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

Albaugh warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Albaugh, and is subject to the inherent risks described above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALBAUGH DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALBAUGH, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF ALBAUGH IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF ALBAUGH, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT ALBAUGH'S ELECTION, THE REPLACEMENT OF THE PRODUCT.

031020

LABEL HISTORY (Not included in final printed label)

FILE NAME	VERSION	COMMENT
	MARK	
042750-00324.20200310	031020	Amendment Active Ingredient and Optional Marketing language