

APR 10 1995

Mr. Robert M. Sielaty
UCB Chemicals Corporation
c/o Compliance Services International
22262 Jefferson Davis Highway #1010
Arlington, VA 22202-3603

Dear Mr. Sielaty:

Subject: Ziram Granuflo
EPA File Symbol 45728-12
Application Dated March 31, 1995, Request To
Amend Register To Meet WPS Requirements

The proposed amendments to the labeling of the subject pesticide product registration requested in your application dated March 31, 1995, to comply with the EPA worker protection standards has been reviewed and are acceptable under the Federal Insecticide, Fungicide and Rodenticide Act as amended.

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

A review of the labeling submitted identified the following deficiencies that must be addressed within 30 days from the date of this letter:

1. Submit an updated Confidential Statement of Formula in compliance with PR Notice 91-2, or submit adequate data from chemical analysis from representative batches of the product to establish limits for this product.
2. Revise the pesticide disposal statement on the label to comply with PR Notice 83-3. It must read:
"Pesticide wastes are acutely hazardous. 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."

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3. The format of the label should be revised to list the ornamental uses in a single section, not commingled with the agricultural use sites. A "Use Precaution" section should be added to accommodate use precautions common to all use-patterns listed on the label.
4. The section "Statement of Practical Treatment" must be amended by adding: "Note to the physician, possible mucosal damage may contraindicate gastric lavage".
5. The "Storage and Disposal" section must include the statement "Do not contaminate water, food or feed by storage or disposal".
6. The use-patterns for the ornamental uses must be revised to list each site of application with the pest(s) controlled, when to apply and the dosimetry of the product to apply; how to apply and restrictions that may be applicable to the use-pattern.

Further action on the subject registration must await your response to comments listed above. Further response to this letter must conform with the "EPA General Information on applying for Registration of Pesticides in the United States", Second Edition, August, 1992. Please use EPA application Form 6570-1 completed in required detail. One of the copies of any labeling changes must be highlighted and described clearly as part of your response.

Sincerely yours,

Joanne I. Miller
 Product Manager (23)
 Fungicide-Herbicide Branch
 Registration Division (7505C)

E.wilson:Diskette:ABC17:04-10-95

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Ziram Granuflo[®]

Fungicide

(The Original 76% Water Dispersible Granules)

EPA Reg. No. 46728-12

EPA Est. 32587-BL-1

Active ingredient:	
Ziram (zinc dimethyl dithiocarbamate).....	76.0%
Inert ingredients:.....	24.0%
	Total 100.0%
Zinc expressed as metallic.....	16.25%

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 10 1995

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

45728-12

KEEP OUT OF REACH OF CHILDREN

DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and immediately flush eyes with a steady stream of water for at least 15 minutes. Get medical attention.
IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.
IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.
IF ON SKIN: Remove contaminated clothing. Wash thoroughly with plenty of soap and water. Get medical attention.

In case of emergency, immediately call (24 hours) 800/424-9300 CHEMTREC or 800/857-8615 UCB Chemicals Corporation.

See Other Panels for Additional Precautionary Statements.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eye damage. May be fatal if inhaled. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Do not breathe dust or spray mist. Harmful if swallowed or absorbed through the skin. May cause irritation of nose and throat.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Socks plus shoes
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. 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.

Engineering controls statements:

- a. 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.

User Safety Recommendation:

- 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.

Environmental Hazards

This product is toxic to fish and wildlife. 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 apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

Physical or Chemical Hazards

Keep away from fire and sparks.

Read entire label carefully and use only as directed.

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 48 hours.

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
- Chemical-resistant headgear for overhead exposure



UCB CHEMICAL
2000 Lake Park Drive
Smyrna, GA 30080

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Zram Granulo is a broad spectrum fungicide for the control of certain diseases in fruit and nut crops, and ornamentals

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

Application Equipment and Rates

Use the recommended rates for concentrate, dilute and aerial applications. Ground application is preferred, especially when full canopy of foliage is developed.

Be sure spray equipment is clean before use; if it is contaminated with any material, crop injury or sprayer clogging may result. Calibrate spray equipment before use.

For deciduous nuts, almonds, and pecans, apply the recommended rate in a minimum of 50 gallons per acre by ground. By air, use 20 gallons per acre, or sufficient water to provide complete coverage.

Under low disease conditions, minimum label rates per application can be used while maximum label rates and shortened spray schedules are recommended for severe or threatening disease conditions.

CHEMIGATION: Do not apply this product through any type of irrigation system.

Mixing Instructions

To mix, fill the spray tank about 2/3 full of water and, with agitator running, slowly fill in the required amount of Zram Granulo. Finish filling the tank with water and let mixing continue in the tank until thoroughly mixed before applying. Continue agitation and apply immediately.

IMPORTANT: When spraying, thorough coverage is necessary to provide good disease control. Make new dilutions for each spraying. Consult State Agricultural Experiment Station recommendations or State Extension Service Specialist for spray schedules for timing and frequency of applications in your area.

Recommendations

ALMONDS: Brown Rot Blossom and Twig Blight, Shot-Hole (Coryneum Blight), Leaf Blight - Use 8 pounds per acre in pre-bloom, blossom and petal fall periods. Scab - Use 8 pounds per acre at petal fall and 5 weeks after petal fall. Do not use later than 5 weeks after petal fall.

APPLES: Scab - Use 6 to 8 pounds per acre in pre-blossom, blossom and early cover stages. Bull's Eye Rot (Oregon and Washington) - Use 6 to 8 pounds per acre beginning 12 to 14 days after calyx stage and repeat as necessary in summer sprays. Perennial Canker (Oregon) - Use 6 to 8 pounds per acre in pre-blossom and calyx stages.

APRICOTS: Brown Rot Blossom and Twig Blight, Shot-Hole (Coryneum Blight) - Use 8 pounds per acre in pre-bloom, blossom and petal fall through early cover sprays.

CHERRIES: Brown Rot, Blossom Blight - Use 4 to 5 pounds per acre in popcorn, full blossom, petal fall and shuck stages and approximately 2 weeks after shuck fall. Do not apply within 7 days of harvest.

CONIFERS: Fusiform Rust in Pine Seedlings - Use 2 lbs. per 100 gallons of water at 3 to 5-day intervals from plant emergence to mid-June. NOT for use in CALIFORNIA.

Metaspora Needle Rust in Douglas Fir Christmas Trees - Use 2 pounds per 100 gallons of water. Make a single application in the spring when new shoot growth is 1/2 to 2 inches in length.

Pucciniastrum Needle Rust in Shasta Fir Christmas Trees - Use 2 lbs. per 100 gallons of water. Make a single application in the spring when new shoot growth is 1/2 to 2 inches in length.

NECTARINES, PEACHES: Peach Blight (Coryneum) and Leaf Curl - Use 8 pounds per acre in the fall before heavy rains. For Leaf Curl only, use 8 pounds per acre as a dormant application prior to bud swell. Brown Rot and Peach Blight (Coryneum) - Use 8 pounds per acre in pre-bloom, blossom and petal fall sprays. May be used in early cover and before harvest. Remove excess residue by washing or wiping.

ORNAMENTALS: Directions, unless otherwise specified, include: Use the specified rate per 100 gallons of water applying at 7 to 10-day intervals during growing season to control the diseases on the ornamentals listed below. NOT for use in CALIFORNIA.

Asters: Rust - Use 1 pound in 12 gallons. Begin application in early season and continue at 7 day intervals until blossoms form.

Azaleas, Camellias: Petal Blight - Use 1-1/2 to 2 pounds. Begin application with first bloom. Repeat at 3 to 5-day intervals through bloom. Apply as a drench to mulch and filler beneath and around bushes.

Carnations, Chrysanthemums, Marigolds, Morning Glory, Snapdragons: Rust - Use 1-2/3 to 2 pounds.

Carnations, Chrysanthemums, Dahlias, Gladiolus, Snapdragons: Leaf Spot - Use 1-2/3 to 2 pounds. Apply at weekly intervals.

Dahlias, Delphinium, Golden Glow, Hollyhocks, Phlox: Powdery Mildew - Use 1-2/3 pounds. Apply at weekly intervals.
Lilies, Peonies, Poinsettias, Tulips: Botrytis - Use 1-1/2 to 2 pounds

Roses: Black Spot, Powdery Mildew - Use 1-2/3 pounds. Begin application when leaves unfold. Repeat at 7 to 10-day intervals throughout season

ORNAMENTAL & ORNAMENTAL FRUIT VARIETIES: Use 2 to 3 pounds per 100 gallons of water. NOTE: DO NOT USE FRUIT FOR HUMAN CONSUMPTION. NOT for use in CALIFORNIA.

Apricots, Sweet Cherries, Wild Cherries, Choke Cherries, Nectarines, Peaches, Flowering Plums (Non-Edible only), European Laurels, Cherry Laurels, Poplar, Maples, Oak, Birch, Alder, Elm, American Hornbeam, California Buckeye: Shoot and Twig Blight, Shot Hole Fungus, Leaf Curl, Cherry Witches Broom, Plum Pockets, Leaf Blister, Catkin Hypertrophy of Alder - Apply as a thorough coverage spray in the dormant period prior to bud swell.

Apples, Flowering Crab Apples, Mountain Ash, Oregon Crab, Pear, Quince, and Service Berry: Anthracnose - Apply as a thorough coverage spray in the Fall and Dormant periods.

Apples, Peach, Pear, Poplar and Willow: European Canker - Apply as a thorough coverage spray in the Fall and Dormant periods.

PEARS: Scab - Use 6 to 8 pounds per acre in pre-blossom, blossom and early cover sprays. Storage Rot (Oregon) - Use 6 to 8 pounds per acre in pre-harvest spray.

PECANS: Scab - Use 8 pounds per acre applying four times at 3 to 4 week intervals starting when tips of small nuts become brown. Under severe disease conditions, a fifth application in August may be required. DO NOT apply after August. NOT for use in CALIFORNIA.

STORAGE AND DISPOSAL

Pesticide Storage
Keep away from fire and sparks.

Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. Do not put concentrate or dilute material into food or drink containers. Do not contaminate other pesticide, fertilizers, water, food or feed by storage or disposal.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call UCB: (804)857-8615.

To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter, or commercial clay. If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

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

Container Disposal
Completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Dealers Should Sell in Original Packages Only.

Terms of Sale or Use: On purchase of this product buyer and user agree to the following conditions:

Warranty: UCB makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Directions and Recommendations: Follow directions carefully. Timing and method of application, weather and crop conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller and are assumed by buyer at his own risk.

Use of Product: UCB's recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Damages: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

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2000 Lake Park Drive
Smyrna, GA 30080

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