



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 3 2000

Kimberly Ratliff
Fair Products, Inc.
P.O. Box 386
Cary, NC 27511

Dear Ms. Ratliff:

Subject: EPA Registration No. 51873-9
Review of Labels for Maleic Hydrazide Reregistration Eligibility Decision (RED)
Your Submission dated November 18, 1999

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

I. Make the labeling changes listed below:

- a. Remove the WPS language from the Precautionary Statement block.
- b. After the second subheading "Directions for Use" add "(continued)" to show that this is a continuation of the "Directions for Use" section.
- c. The First Aid statements Precautionary Statements must not be grouped together in the same block. Please remove the last sentence "In case of eye contact, flush thoroughly with water for at least 15 minutes. Call a physician." Preferably move this sentence to the front panel and add the subheading "First Aid". Replace the words "In case of eye contact" with "If in Eyes". See copy of enclosed sample label.
- d. Under the First Aid subheading, you must also add "If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists."
- e. Revise Precautionary Statements to read "Causes moderate eye irritation. Harmful if absorbed through the skin. Avoid contact with eyes, skin or clothing. Harmful if inhaled. Avoid inhalation of mist."

2. Submit three (3) copies your revised labeling within 20 days from the date of this letter prior to issuance of the Reregistration of this product.

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

Sincerely,



Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

FAIR 30[®]

A 2.25 lb Maleic Hydrazide Product
FOR THE PREVENTION OF GROWTH OF TOBACCO SUCKERS

ACTIVE INGREDIENT

Potassium salt of 1,2-Dihydro-3, 6 pyridazinedione* 30.15%

INERT INGREDIENTS 69.85%

TOTAL 100.0%

*Hereinafter called potassium salt of maleic hydrazide

This product contains 2.25 lbs. maleic hydrazide (MH) equivalent per gallon

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ ENTIRE LABEL CAREFULLY BEFORE USING THIS PRODUCT

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

SHAKE WELL BEFORE USING

If not used in accordance with directions, plant injury, or other undesirable results may occur.
Do not inhale mist. Avoid contact with eyes, skin and clothing

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured by
Fair Products, Inc. USA

Agri-Specialties Division
Post Office Box 386

Cary, North Carolina 27512
Telephone: (919) 467-8352



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NOTES AND LIMITATIONS

1. Do not make more than one application per season.
2. Do not harvest earlier than 7 days after application.
3. Should wash off occur within 8 hours a single repeat application may be made.
4. Do not use on seed tobacco.
5. Make sure spray equipment is clean before using.
6. Do not allow drift to nearby crops.
7. At 40 degrees F. and below, the formulation will form solids. If readily redissolve, but must be warmed to 50 degrees F. or above. The larger the container the more time is needed to completely redissolve the precipitate.

FAIR 30 normally requires 8 hours contact with the plant for full results. Rain occurring within six hours of spraying reduces effectiveness. Also extremely dry weather conditions reduce the optimum effect. Do not harvest the tobacco until fully ripe. When tobacco has been properly treated with FAIR 30, or closely hand suckered, it will not ripen as rapidly as untreated tobacco. Under certain conditions tobacco tips treated with FAIR 30 tend to turn yellow prematurely. This does not mean that the tobacco is ripe or that it has been harmed. Do not use time and color of the leaves as the only guide to the ripeness of FAIR 30 treated tobacco, use other characteristic indications of ripeness, such as the change in the leaf texture and the fading of the color from the mid-rib. Premature harvesting results in poor tobacco quality. Leaving one row of tobacco untreated can be helpful in determining when the treated tobacco is ripe. Best results are obtained when FAIR 30 is applied on humid mornings after the dew has disappeared from the plants. Avoid application of FAIR 30 during the hot, mid day or afternoon sun. It is important to use the correct amount of FAIR 30 and to follow directions carefully. Do not use too much of it. Too little will not achieve the proper sucker control. Rinse the spray tank and equipment after spraying but do not contaminate natural waters by cleaning of equipment or disposal of wastes. FAIR 30 reacts slowly on plants grown under drought conditions and the results may not be as good as on plants treated under normal conditions.

WARRANTY STATEMENT: Seller's guarantees shall be limited to the terms of the label and subject thereto the buyer assumes any risk to person or property arising out of use or handling and accepts the product on these conditions.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JAN 3 2000

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

51873-9

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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 persons, either directly or indirectly 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 USER 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 workers entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for entry into 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
- Shoes plus socks
- Waterproof gloves
- Protective eyewear

STORAGE AND DISPOSAL

1. **PROHIBITIONS** - Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.
2. **PESTICIDE DISPOSAL** - Pesticide spray mixture or sludge that cannot be used according to label instructions must be disposed of according to applicable federal, state, or local procedures.
3. **CONTAINER DISPOSAL** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or dispose of in a sanitary landfill or by incineration if allowed by state and local authorities.
4. **STORAGE** - Store in original container only. After partial use, replace lid and close tightly. Store in a secure place that is temperate and dry. The active ingredient in Fair 30 will separate from the surfactant at temperatures above 134° F. If containers are exposed to excessive heating, the contents can be remixed by lowering the temperature below 134° F and applying agitation. ALWAYS SHAKE OR STIR WELL BEFORE USE.
5. **GENERAL** - Consult federal, state, or local disposal authorities for approved alternative procedures such as limited open burning.

DIRECTIONS FOR USE

FAIR 30 is a later-made formulation exclusively for tobacco use. The active ingredient is the time-tested and classic growth retardant, Maleic Hydrazide in the form of the potassium salt. This formulation contains an agricultural surfactant (wetting agent) to facilitate better "sticking" especially under adverse weather conditions. It is necessary to apply FAIR 30 at the correct time, in the correct amounts, and in equal amounts to each plant, in order to obtain the optimum sucker control. Only the upper 1/3 to 1/2 of the plant needs to be sprayed for best results. FAIR 30 is absorbed by the tobacco leaves and spreads throughout the entire plant. Please follow directions carefully.

FLUE CURED, BURLEY, DARK FIRE, MARYLAND TOBACCO

WHEN TO APPLY:

When all plants flower at the same time, wait until the plants are in full flower, then top and pull all suckers from the early maturing plants and within 24 hours after topping, spray FAIR 30 onto the entire field. "Full flower" is the stage when 80% of the plants have started shedding their first flowers. In most years, plants flower over a wide range of time. In these situations, FAIR 30 treatments should be preceded by application of "contact type" sucker control materials such as FAIR 25 or FAIR-TAC which allow uneven crops to become uniform before MH application. When the remaining plants are in full flower, top them and remove the suckers from the entire field, then spray FAIR 30 within 24 hours after topping. The top leaves to be harvested should be at least 6 to 8 inches long at the time of application of FAIR 30.

Special Directions for Burley Tobacco:

Alternatively, to reduce maleic hydrazide (MH) residues and enhance sucker control apply Fair 30 as soon as 10 to 25% of the plants have open flowers or whenever the majority of plants have 20 to 25 harvestable leaves (about 8 inches long and about 5 inches wide). This will result in MH application 7 to 14 days earlier than the normal application at full to late flower.

HOW MUCH FAIR 30 TO APPLY:

FLUE CURED, BURLEY, COGAR (PENNSYLVANIA AND WISCONSIN) AND MARYLAND TOBACCO, use 3.5 quarts of FAIR 30 per 6000 plants per acre or 1 to 1.25 gallons of FAIR 30 per 6000 plants per acre. On small plots, use 1 to 1.25 pints of FAIR 30 per 1000 plants in 3 gallons of water.

DARK TOBACCO: use double the above amounts - example, use 1.75 gallons of FAIR 30 per 6000 plants per acre or 2 pints of FAIR 30 per 1000 plants in 3 gallons water for small plots.

HOW TO APPLY:

FAIR 30 can be applied by tractor or animal drawn sprayer or with a compressed air shoulder sprayer. Any number of nozzles may be used and it can be applied in the same manner as insecticides. Spray one or more rows at a time, waiting only the upper one-third to one-half of the plants. When using a compressed air shoulder sprayer with a single nozzle, spray one side of each tobacco row while walking at a constant rate, using a uniform motion to maintain the upper 6 to 8 leaves of each plant, and apply equal amounts of spray to each plant. Make sure to use a nozzle that delivers a fine, mist spray. Apply FAIR 30 in 20 to 50 gallons of water per acre. DO NOT use less than 20 gallons of water per acre.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes eye irritation. Do not get in eyes, on skin or on clothing. Harmful if swallowed. Avoid inhalation of mist. In case of eye contact, flush thoroughly with water for at least 15 minutes. Call a physician.

PERSONAL PROTECTIVE EQUIPMENT APPLICATORS AND OTHER HANDLERS MUST WEAR:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks.
- Protective eyewear.

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, 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 toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface waters present or to intertidal areas below the mean high water mark. Do not apply this product through any type of irrigation system. Do not contaminate water when disposing of equipment washwaters.

SURFACE WATER ADVISORY

Under some conditions, maleic hydrazide (MH) may have a significant potential for runoff into surface water (primarily via dissolution in runoff water), for several days post-application. Conditions favoring runoff include poorly draining soils or wet soils with readily visible slopes, frequently flooded areas, areas where an intense or sustained rainfall is forecast to occur within 48 hours, areas overlying extremely shallow ground water, and areas overlying tile drainage systems that flow to surface water.

7/20/74