



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Thomas A. Tucker
Fair Products, Inc.
P.O. Box 386
Cary, NC 27512

APR - 1 2003

Subject: FAIR-80 SP®
EPA Reg. No. 51873-17
Your amendment dated March 3, 2003

Dear Mr. Tucker:

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:

Delete the explanatory notes such as "***DRAFT**...", "PROPOSED CHANGES IN RED", "(changes outlined in PR Notice 2001-1 in Red)" and "(Changed at request of Local EPA to adhere to PR Notice 83-3 criteria)"

FIRST AID:

Make the FIRST AID box a separate box from the PRECAUTIONARY STATEMENTS box.

Delete the word "PYRIDAZINONE"

Move the section "If in eyes" to the top of the list.

PERSONAL PROTECTIVE EQUIPMENT - APPLICATORS AND ...: Change "waterproof gloves" to "Chemical resistant gloves made of a waterproof material."
(pages 2 and 3)

ENVIRONMENTAL HAZARDS: Move this section into the box that has the heading "Precautionary Statements."

SURFACE WATER ADVISORY: Move this section into the box that has the heading "Precautionary Statements."

DIRECTIONS FOR USE: It is a violation.... Move this section to immediately after the FIRST AID box.

Add a major heading "USE PRECAUTIONS" immediately before the "PERSONAL PROTECTIVE CLOTHING" heading.

AGRICULTURAL USE REQUIREMENTS: Change "waterproof gloves" to "Chemical resistant gloves made of a waterproof material."

STORAGE AND DISPOSAL:

Make the subheading for paragraph 1 read "PESTICIDE STORAGE".

PESTICIDE DISPOSAL: Delete the entry "(Reference: LP86-01)"

Under *GENERAL*, insert a comma between "federal" and "state"

NOTES AND LIMITATIONS - item 8. This note appears to contradict the mixing instructions. Suggest that this note be eliminated and that the section "USING THE WATER-SOLUBLE PACKAGE:" be revised in part to read:

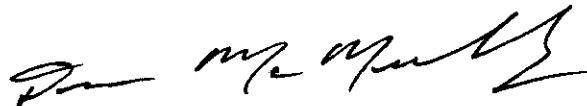
- 2. Fill clean spray tank ½ full with clean water.
- 3. Test to be sure spray tank agitation is working properly.
- 4. Turn off spray tank agitation and bypass.
- 5. Open outer packaging
- 6. Make sure the water soluble
- 7. Start agitation

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

Submit one (1) copy of the final printed label before you release the product for shipment or within 30 days, whichever is less. This revised label will be used for product specific reregistration.

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

Sincerely,



Dennis McNeilly
Acting Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

3 7 9

****DRAFT****

EPA Approved 08/24/1995 label Updated 02-24-03

FAIR 80 SP/Front Panel

****PROPOSED CHANGES IN RED****

FAIR 80 SP[®]

A water-soluble Maleic Hydrazide Product
FOR THE SYSTEMIC PREVENTION OF TOBACCO SUCKER GROWTH

KEEP OUT OF REACH OF CHILDREN
CAUTION

ACTIVE INGREDIENT:

Potassium salt of 1,2-Dihydro-3, 6-pyridazinedione*....80.00%

INERT INGREDIENT.....20.00%

TOTAL.....100.00%

*Hereinafter called potassium salt of maleic hydrazide CAS No. 28382-15-2

This product contains 60% maleic hydrazide (MH) CAS No. 123-33-1 equivalent by weight

READ ENTIRE LABEL BEFORE USING THIS PRODUCT

Use Entire Contents Immediately After Removal from Outer Wrapping

EPA REG. NO. 51873-17
EPA EST. NO. 45671-NC-01

NET CONTENTS:
3.75 Pounds
(1700 gms)

Sold by

Fair Products, Inc., USA
Agri-Specialties Division
Post Office Box 386
Cary, North Carolina 27511
Telephone: (919) 467-8352

ACCEPTED
with COMMENTS
In EPA Letter Dated:

APR 1 2003

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

51873-17

****DRAFT****

EPA Approved 08/24/1995 label Updated 02-24-03



FAIR 80 SP /Front panel

(changes outlined in PR Notice 2001-1 in Red)

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals

CAUTION

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing.
Harmful if inhaled. Avoid inhalation of dust or mist.

FIRST AID

PYRIDAZINONE-MALEIC HYDRAZIDE

<p>If On Skin or Clothing:</p>	<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.
<p>If In Eye:</p>	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 12-20 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.
<p>If Swallowed:</p>	<ul style="list-style-type: none"> Call a poison control center or doctor 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.
<p>If Inhaled:</p>	<ul style="list-style-type: none"> 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 treatment advice.

HOT LINE NUMBER

PYRIDAZINONE-MALEIC HYDRAZIDE

For more information on this product call (919) 467-4352, Monday through Friday 9 am to 5 PM EST.
For a 24-hour poison control center or call the National Poison Control Hotline at 1-800-222-1222.
For a 24-hour poison control center, have the container or label with you when calling or going for treatment.

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.

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EPA Approved 08/24/1995 label Updated 02-24-03

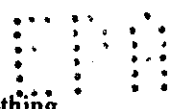
FAIR 80 SP /Front panel (continued)



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 water is 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.

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 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 12 hours.

PPE required for early 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
- Waterproof gloves
- Shoes plus socks
- Protective eyewear.

****DRAFT****

EPA Approved 08/24/1995 label Updated 02-24-03

FAIR 80 SP /Front panel (continued)

(Changed at request of Local EPA to adhere to PR Notice 83-3 criteria)

STORAGE AND DISPOSAL

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

- 1. **STORAGE** - Do not stack over 2 pallets high. Store original containers in cool dry place away from food, water and feed.
- 2. **PESTICIDE DISPOSAL** - Pesticide wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility (Reference: LP86-01).
- 3. **CONTAINER DISPOSAL** - Do not open inner, water-soluble bag. Place entire water-soluble, inner bag and its contents into application equipment. Dispose of empty outer bag in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned stay out of smoke.
- 4. **GENERAL** - Consult federal state or local disposal authorities for approved alternative procedures in your area.

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EPA Approved 08/24/1995 label Updated 02-24-03

FAIR 80 SP /Rear panel,p.1

DIRECTIONS FOR USE

FAIR 80 SP is a tailor-made water-soluble powder (SP) formulated exclusively for use on tobacco. The active ingredient is the systemic growth retardant Maleic-Hydrazide (MH) in the form of the potassium salt (KMH). This formulation contains an agricultural surfactant (wetting agent) to facilitate better "sticking" especially under adverse weather conditions. It is necessary to apply FAIR 80 SP at the correct time, in the correct amounts, and in equal amounts to each plant, in order to obtain optimum sucker control. FAIR 80 SP should be applied to the upper 1/3 to 1/2 of the plant for best results. Plants to be sprayed should be dry and free of dew at the time of application. Best results are obtained when FAIR 80 SP is applied on humid mornings after the dew has disappeared from the plants. Avoid application of FAIR 80 SP during the hot, mid-day or afternoon sun. FAIR 80 SP sprays should not be applied to the undersides of leaves since undesireably high MH residues may result.

It is important to use the correct amount of FAIR 80 SP 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 before and after each use but do not contaminate waters by cleaning of equipment or disposal of wastes. FAIR 80 SP normally requires a minimum of 6 hours contact with the plant for full results. Rain occurring within six hours of spraying may reduce effectiveness. Also extremely dry weather conditions reduce the optimum effect.

FAIR 80 SP is a TRUE SYSTEMIC which is absorbed by the tobacco leaves and spreads throughout the entire plant. **Please follow directions carefully.**

USING THE WATER-SOLUBLE PACKAGE:

FAIR 80 SP is contained in a water-soluble inner bag designed to eliminate exposure of mixers, loaders and handlers to the active ingredient (MH). To ensure that the bag dissolves completely, read and follow exactly the directions described below:

1. Take time to read entire FAIR 80 SP label completely before proceeding.
2. Fill clean spray tank 1/2 full with clean water (**DO NOT START AGITATION OR BYPASS**).
3. Open outer packaging and drop the desired number of water-soluble packs into the spray tank one at a time. (**DO NOT OPEN WATER-SOLUBLE PACKS BEFORE ADDING TO SPRAY TANK**)
4. Make sure the water soluble bags have completely dissolved **BEFORE** starting agitation and bypass.
5. Start agitation and bypass and continue to fill the spray tank to the proper volume with clean water.

RATE CONVERSION FROM LIQUID MH PRODUCTS TO FAIR 80 SP

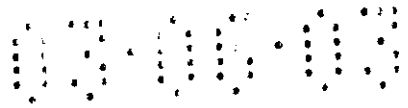
One 3.75 lb container of FAIR 80 SP contains 2.25 lb MH and is equivalent to one gallon of FAIR 30 or, 1 1/2 gallon of FAIR PLUS. One pound, (453 gms or 16 oz) of FAIR 80 SP contains 0.6 lb MH equivalent.

TYPICAL USE RATES

For FLUE-CURED, BURLEY, CIGAR(Wisconsin or Pennsylvania) and MARYLAND Tobacco use one container (3.75 lb) FAIR 80 SP per acre to provide 2.25 lb MH equivalents per acre. For DARK Tobacco use double the above amount.(see "Directions for Use")

****DRAFT****

EPA Approved 08/24/1995 label Updated 02-24-03



FAIR 80 SP/Rear panel, p.2

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 80 SP onto the entire field. "Full flower" is the stage when 90% of the plants have started shedding their first flowers. In most years, plants flower over a wide range of time. In these situations, FAIR 80 SP treatments should be preceded by application of "contact type" sucker control materials such as FAIR 85 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 80 SP within 24 hours after topping. Spraying FAIR 80 SP too early may prevent normal development of tip leaves. To avoid this, all tip leaves to be harvested should be at least 6 to 8 inches long at the time of FAIR 80 SP application.



Special Directions for Burley Tobacco:

Alternatively, to reduce maleic hydrazide (MH) residues and enhance sucker control apply Fair 80 SP 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 80 SP TO APPLY:

FLUE CURED, BURLEY, CIGAR (Pennsylvania and Wisconsin) and **MARYLAND TOBACCO**, use one container (3.75 pounds or 1700 gms) of FAIR 80 SP per 6000 to 8000 plants per acre in 30 to 50 gallons of water per acre. On small plots, use one-half pound (8 Oz) or 227 gms of FAIR 80 SP per 1000 plants in 3 gallons of water.

DARK TOBACCO: use double the above amounts -example, use **TWO FULL CONTAINERS** (7.5 pounds) of FAIR 80 SP per 6000 plants per acre or one pound (453 gms) of FAIR 80 SP per 1000 plants in 3 gallons water for small plots.

HOW TO APPLY:

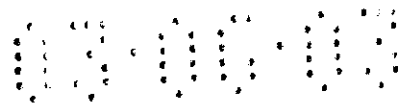
FAIR 80 SP can be applied by tractor or animal drawn sprayer or with a compressed air shoulder sprayer. Any number of nozzles may be used and it can be applied in the same manner as insecticides. Spray one or more rows at a time, wetting only the upper one-third to one-half of the plants. When using 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 moisten 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. Avoid application to the undersides of plant leaves as this could result in abnormally high MH residues. Apply FAIR 80 SP in 30 to 50 gallons of water per acre. **DO NOT** use less than 30 gallons of water per acre.

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 6 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. Do not apply this product through any type of irrigation system.
8. Make sure spray tank agitation is working properly before adding FAIR 80 SP.

****DRAFT****

EPA Approved 08/24/1995 label Updated 02-24-03



FAIR 80 SP, rear panel, p.3

HARVEST COMMENTS:

Do not harvest tobacco until it is fully ripe. When tobacco has been properly treated with FAIR 80 SP, or closely hand suckered, it will not ripen as rapidly as untreated tobacco. Under certain conditions tobacco tips treated with FAIR 80 SP 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 80 SP treated tobacco, use other characteristic indications of ripeness, such as the change in the leaf texture and the fading of 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. FAIR 80 SP 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 persons or property arising out of use or handling and accepts the product on these conditions.