

AUG 2 2004

Theodore D. Head  
Nufarm Agriculture USA  
1333 Burr Ridge Parkway, Suite 125  
Burr Ridge, IL 60527

SUBJECT: Response to Agency Letter Dated April 26, 2004  
Nufarm Champion Technical  
EPA Reg. No. 55146-3  
Your Submission Dated May 20, 2004

Dear Mr. Head:

The Agency has reviewed the above mentioned submission and has determined that the application is not acceptable for the following reasons:

1. On page 2, there's a Storage and Disposal heading and no information follows the heading. Please clarify.
2. In the Directions for Use section, move the following sentences and place them directly under the Signal Word: "Usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)"

Submit five (5) copies of draft labeling incorporating the abovementioned changes.

Sincerely,



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

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

AUG 2 2004

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

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55146-3

## Champion Technical

### For Manufacturing Use Only

#### ACTIVE INGREDIENT:

COPPER HYDROXIDE .....88.0%

OTHER INGREDIENTS:.....12.0%

TOTAL 100.0%

EPA Reg. No. 55146-3

EPA Est. No. 35896-SC-1

KEEP OUT OF REACH OF CHILDREN

**DANGER- PELIGRO**

FIRST AID	
If swallowed	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <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 a doctor for treatment advice.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<ul style="list-style-type: none"> <li>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</li> <li>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate use of gastric lavage.</li> <li>For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300.</li> <li>For Medical Emergencies Only, Call 877-325-1840.</li> </ul>	

Net Contents: 50 LBS

EPA

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§ 2104

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER**

Corrosive. Causes irreversible eye damage. Harmful if inhaled. Harmful if swallowed or absorbed through skin. May cause skin sensitization in certain individuals. Do not get in eyes or inhale dust. Wear goggles or face shield and dust mask while handling, mixing or loading. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. (PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente.)

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For use only in formulating agricultural fungicide and bactericide products, antifouling coating products and in wood preservative formulations. It is the responsibility for formulators using this product to register all formulations made from it with the EPA as a fungicide, agricultural bactericide, antifouling coating or wood preservative product. Before using this product to formulate any agricultural fungicide or bactericide, antifouling coating or wood preservative product be sure to consult the technical manual which is available from the manufacturer. SI USTED NO ENTIENDE LA ETIQUETA, BUSQUE A ALGUIEN PARA QUE SE LA EXPLIQUE A USTED EN DETALLE. (IF YOU DO NOT UNDERSTAND THIS LABEL, FIND SOMEONE TO EXPLAIN IT TO YOU IN DETAIL.)

**STORAGE AND DISPOSAL**

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EPA

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**WARRANTY STATEMENT**

NUFARM AMERICAS INC. warrants that the product conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions. THERE ARE NO OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING A WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE. This warranty does not extend to the handling or use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller and buyer assumes all risk of any such use.

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Nufarm Americas, Inc.; AGT Division  
Burr Ridge, IL 60527