

55146-72

1-19-2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 19 2000

Ms. Nancy R. Robey
Regulatory Specialist
Agtrol International
7322 S. W. Freeway, Suite 1400
Houston, Texas 77074

Subject: Agri Tin
EPA Registration No. 55146-72
RE: Label amendments as part of TPTH RED Settlement agreement
Your Submission dated December 23, 1999

Dear Ms. Robey:

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:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Add the statement "Human flaggers and applicators must be in enclosed cabs." at the end of the Engineering Controls Statements.
 - b. Under PPE equipment in the Precautionary Statements block, revise third paragraph to read "Handlers, mixers, loaders, applicators and flaggers using engineering controls must wear.....during mixing and loading." Also to this paragraph, add the PPE requirement of chemical resistant apron.
 - c. The Precautionary Statements block must be arranged as follows:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
PPE requirements
User Safety Recommendations
Environmental Hazards

The statements must be grouped together. The User Safety Recommendation must be in separate block. The Environmental Hazard statements must not be enclosed in a separate block, it should be a part of the larger Precautionary Statements block.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

Sincerely,



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

cc: Nancy Zahedi
Special Review & Reregistration
Division (7508C)

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12/22/99

RESTRICTED USE PESTICIDE

Because of the high acute toxicity of triphenyltin hydroxide and its potential for affecting fetal development, this product may be applied only by certified applicators or person directly under their supervision.

For retail sale to and use by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicators certification.

Agri Tin™

Agricultural Fungicide

Active Ingredient:

Triphenyltin Hydroxide	80.0%
Other Ingredients:.....	<u>20.0%</u>
Total	100.0%

Contains 1.87 pounds triphenyltin hydroxide per 2.34 pound twin pack.

**KEEP OUT OF REACH OF CHILDREN
DANGER-PELIGRO**



**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JAN 19 2000

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

55146-72

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 ON SKIN: Wash with plenty of soap and water. Get medical attention.
- IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.
- IF IN EYES: Flush with plenty of water. Call a physician.
- IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Call a physician or Poison Control Center. Avoid alcohol.
- NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

See Label for Additional Precautions and Directions for Use.

Agrotol International
EPA Reg. No. 55146-72

Houston, Texas USA 77074
EPA Est. No. _____

Net Weight: 2.34 lbs. (2 - 1.17 pound twin pack)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)
DANGER- PELIGRO**

Fatal if inhaled. Corrosive, causes irreversible eye damage and skin burns. May be fatal if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breath dust, vapor or spray mist. The United States Environmental Protection Agency has determined that triphenyltin hydroxide, the active ingredient of this product, affects fetal development in laboratory animals. Exposure to this product during pregnancy should be avoided.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are butyl rubber, nitrile rubber, or neoprene rubber. If you want more options, follow the instructions for Category A on an EPA chemical-resistant category selection chart.

Handlers exposed to the concentrate or diluted product must wear coveralls over long-sleeved shirt and long pants, chemical-resistant footwear plus socks, chemical-resistant gloves, such as butyl rubber, nitrile rubber, or neoprene rubber, protective eyewear, chemical-resistant apron for mixing and loading or equipment maintenance, chemical-resistant headgear for overhead exposure, dust/mist filtering respirator (MSHA/NIOSH approval TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter.

Handlers using engineering controls must wear long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves, such as butyl rubber, nitrile rubber, or neoprene rubber, during mixing and loading.

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

Follow the 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:

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 RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, or using tobacco or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should 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 pesticide is toxic to fish and wildlife. 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 allow this product to drift from the target site. Do not apply with aircraft within 300 feet or with groundboom equipment within 100 feet of any natural body of water such as rivers, streams, ponds, lakes and reservoirs. Do not apply with aircraft when wind speed is greater than 10 mph. Apply this pesticide only as specified on this label. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

DIRECTION 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 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), notification to workers and restricted-entry intervals. 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 to enter treated areas during the restricted-entry interval (REI) of 48 hours for all crops.

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 over long-sleeved shirt and long pants, chemical resistant gloves, such as butyl rubber, nitrile rubber, or neoprene rubber, shoes and socks, protective eyewear, chemical-resistant headgear for overhead exposure.

Notify worker of the applications by warning them orally and by posting warning signs at entrances to treated areas.

GENERAL INSTRUCTIONS

GROUND AND AERIAL APPLICATION: AGRI TIN can be applied as a ground or aerial spray to control fungal infestations on listed crops. Application rates are for general use and must not be exceeded. The state agricultural extension or agricultural experiment station specialist should be consulted for specific applications and timing recommendations. With any spray application, thorough coverage is essential for good control. Do not apply this product through any type of irrigation system except on potatoes. Apply this product only as specified on this label. In case of accidental exposure, see Statement of Practical Treatment.

Do not allow this product to drift from the target site.

AERIAL SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather-related factors determine the potential for spray drift. The applicator and grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops.

1. The distance of the outermost nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the airstream and never be pointed downward more than 45 degrees.

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the **Aerial Drift Reduction Advisory Information (below)**.

Aerial Drift Reduction Advisory Information:

This section is advisory in nature and does not supersede the mandatory label requirements.

INFORMATION ON DROPLET SIZE: The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly or under unfavorable conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

CONTROLLING DROPLET SIZE:

1. Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
2. Pressure - Do not exceed the nozzle manufacturers recommended pressures. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
3. Number of nozzles - Use the minimum number of nozzles that provide uniform coverage.
4. Nozzle orientation - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
5. Nozzle type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift potential.

BOOM LENGTH: For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

APPLICATION HEIGHT: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

SWATH ADJUSTMENT: When applications are made with a crosswind, the swath will be displaced downward. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller crops, etc.)

WIND: Drift potential is lowest between wind speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY: When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS: Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form at the sunsets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves lateral in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS: This pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

MIXING PROCEDURES: When using AGRI TIN alone, open outer bag, and place the entire water-soluble pack into the filled spray tank and close tank immediately. Do not open water-soluble pack. If boron or other

micronutrients, fertilizers or other crop protection chemicals are to be used, fill spray tank 2/3 full, with agitation running add AGRI TIN and close lid. **Do not open water-soluble pack.** Allow approximately 10 minutes for the water-soluble pack to dissolve. After pack has dissolved, add other products and remaining water. Continue agitation during spray out. See PRECAUTIONS STATEMENT below on emulsifiable concentrate insecticides.

CHEMIGATION: Do not apply this product through any type of irrigation system on crops other than potatoes. Apply this product only through one or more of the following types of systems: sprinkler including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set or hand move irrigation system. Do not apply this product through any other type of irrigation system. Crop injury, lack of effectiveness or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.

For specific information about calibration, contact State Extension Service specialists, equipment manufacturers or other irrigation experts.

Do not connect an irrigation system used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustment should the need arise.

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, day care centers, hospitals, in-patient clinics, nursing homes or any public areas such as schools, parks, playgrounds or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any location affording maximum visibility to sensitive areas. The printed side of the sign should face away from the treated area towards the sensitive area. The signs shall be printed in English. Signs must be posted prior to application. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and symbols shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words KEEP OUT, followed by an octagonal stop sign

symbol at least 8 inches in diameter containing the word STOP. Below the symbol shall be the words PESTICIDES IN IRRIGATION WATER. This sign is in addition to any sign posted to comply with the Worker Protection Standard.

SPRINKLER CHEMIGATION: The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back-flow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

PRECAUTIONS: Agtrol does not recommend mixing with surfactants, spreaders, stickers or buffers unless testing or prior experience has shown the mixture to be non-phytotoxic to the crop. Combinations with some pesticides, micronutrients, spreaders, stickers, surfactants or buffering agents can increase phytotoxicity. Phytotoxicity may be severe. Emulsifiable concentrate insecticides can be especially injurious in combination. Do not graze dairy or meat animals in treated areas.

GENERAL APPLICATION INSTRUCTIONS

SUGARBEET, *Cercospora Leaf Spot, Suppression of beet army worm.* Apply 2.5 to 5.0 dry ounces per acre (15-7.5 acres/2.34 lb. per twin-pack or 7.5 - 3.75 acres per single pack). Ground (Closed Cabs Only): Apply in at least 15 gallons of water. Full coverage of the foliage is necessary for best results. Aerial (helicopter or fixed wing aircraft). Apply in 5 to 10 gallons of water. Diluted spray should be directed uniformly to all parts of the plant. Use lower gallonage when

plants are small and increase volume with plant size. Use lower rate for protective sprays and the higher rates later in the season or during high infection periods. Applications should begin when Leaf Spot conditions appear or when the disease is in the area and repeated at 10 to 14 day intervals. In all states **EXCEPT** Minnesota, North Dakota, and Michigan, the maximum amount of product that can be applied is 10 ounces of Agri Tin. For Minnesota, North Dakota, and Michigan, a maximum seasonal amount of 15 ounces of Agri Tin may be applied. Do not treat within 21 days of harvest. Do not graze or feed beet tops to livestock.

POTATO, Early Blight, Late Blight, Suppression of Colorado Potato Beetle. Apply 2.5 to 3.75* dry ounces per acre (15-10 acres/2.34 lb. per twin-pack or 7.5-5 acres per single pack). Ground (Closed Cabs Only): Apply in a least 15 gallons of water. Full coverage of the foliage is necessary for best results. A spray pressure of less than 200 psi is recommended. Aerial: Apply in 3 to 10 gallons of water. For helicopter application, fly high enough so as not to whip the vines. Chemigation: AGRI TIN should be added through a traveling irrigation system continuously or at the last 30 minutes of solid set or hand moved irrigation systems. Agitation is recommended. Diluted spray should be directed uniformly to all parts of the plant and the gallonage increased according to the size of the plants. Application should begin with the appearance of blight weather conditions and continue on a 7-day schedule. Do not treat within 7 days of harvest. Do not exceed 11.25 ounces/acre per season. The lower rate of application should be used early in the season and the high rate mid to late season or when blight infection is in the area.

PEST MANAGEMENT SYSTEMS. When used in combination with another fungicide registered for disease control on potatoes, a 1.87 ounce/acre rate may be employed.

PECAN, Scab, Brown Leaf Spot, Downy Spot, Powdery Mildew, Liver Spot, Sooty Mold, Leaf Blotch. Apply 5.0 to 7.5 dry ounces per acre (7.5-5 acres/2.34 lb. per twin-pack or 3.75-2.5 acres per single pack). Ground (Closed Cabs Only): Apply in sufficient water to provide for full coverage. Aerial: Apply in a minimum of 20 gallons of water. Diluted spray should be directed to all parts of the tree. Application should begin at pre-pollination stages when the young leaves are unfolding, and a second application made when the small nuts are forming. Apply a maximum of nine treatments during a single growing season at 2 to 4 week intervals as needed to maintain control. Use the lower rate for the first two applications or until the disease becomes severe or during dry weather. Use the higher rate during wet weather or during severe Scab, Powdery Mildew, or other disease infections. Do not apply within 30 days of harvest. Apply a maximum seasonal use rate of 30 ounces of Agri Tin for pecans grown west of Interstate 35. Apply a maximum seasonal use rate of 45 ounces of Agri Tin for pecans grown east of Interstate 35.

STORAGE AND DISPOSAL

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

Container Disposal: Completely empty outer bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by state or local authorities, by burning. If burned stay out of the smoke.

Pesticide Disposal: 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.

WARRANTY STATEMENT

Agtrol International 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, EXPRESS 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.

Agtrol International
Houston, TX

Made in _____