



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

5803697

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 7 2008

Mr. Bert A. Volger
Agriphar, SA
c/o Ceres International LLC
1087 Heartsease Drive
West Chester, PA 19382

Subject: Sylitt FL Fungicide
EPA Reg. No. 55260-6
Your Submission of January 29, 2007

Dear Mr. Volger:

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(B), is conditionally accepted provided that the following revisions are made to the label:

1. Under the precautionary statements, revise the Environmental Hazards section as follows:
 - a. Add the statement "This pesticide is toxic to fish, aquatic invertebrates, oysters and shrimp." at the beginning of the current paragraph.
 - b. Delete the last sentence in the current paragraph.
 - c. Add the following paragraphs below the current paragraph:

"Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas."

"This product may contaminate water through runoff and has a potential for runoff for several weeks after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product. A level, well maintained vegetative buffer strip between areas to which the product is applied and surface water features such as ponds, streams, and springs will reduce the potential for contamination of water from rainfall-runoff. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours. Sound erosion control practices will reduce this product's contribution to surface water contamination."

- 2. On page 3 under Compatibility, correct the spelling of "Methidathion" in the first paragraph. In the second paragraph in the third line, correct the spelling of "foliar" and "Dincap". In the next to last sentence, change "should" to "may".
- 3. In the directions for use for bananas, the proposed directions do not reflect the use pattern used in the field trials in Hawaii for which data were submitted. Revise the directions for use to make 5 applications at 0.71 lbs ai (1.66 pints product)/acre for a seasonal total of 3.6 lbs ai/acre/season.
- 4. Revise the section IMPORTANT READ BEFORE USE on page 6 as follows:
 - a. In the paragraph following CONDITIONS, change "All such risks shall be assumed . ." to "To the extent consistent with applicable law, all such risks shall be assumed . . .".
 - b. In the paragraph following DISCLAIMER OF WARRANTIES, change "AGRIPHAR DISCLAIMS ANY LIABILITY WHATSOEVER . . ." to "TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, AGRIPHAR DISCLAIMS ANY LIABILITY WHATSOEVER . . ."
 - c. In the paragraph LIMITATIONS OF LIABILITY, change "THE EXCLUSIVE REMEDY OF THE USER . . ." to "TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER . . .".
- 5. Submit one copy of the final printed label before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

Sincerely yours,

Mary L. Waller
 Mary L Waller
 Product Manager 21
 Fungicide Branch
 Registration Division (7505P)

Enclosure



ACCEPTED
with COMMENTS
In EPA Letter Dated

AUG 7 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No. 55260-6

SYLLIT[®] FL FUNGICIDE

FOR CONTROL OF CERTAIN DISEASES OF APPLES, BANANAS, CHERRIES,
PEACHES, PEANUTS, PEARS, PECANS, STRAWBERRIES AND WALNUTS.

ACTIVE INGREDIENT:

Dodine (n-dodecylguanidine acetate) 39.6%*

INERT INGREDIENTS: 60.4%

TOTAL: 100.0%

*Equivalent to 3.4 pounds Dodine per gallon

EPA Reg. No. 55260-6

EPA Est. No. 55260-BL-001

**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.)

FIRST AID

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing and shoes. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER

For MEDICAL and TRANSPORTATION EMERGENCIES ONLY call CHEMTREC 24 hours a day
800-424-9300. For PRODUCT USE Information call your Distributor.

"Have the product container or label with you when calling a poison control center or doctor, or going to treatment."

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the usage of gastric lavage.

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PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Do not get in eyes. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin or clothing. Wear protective eyewear (goggles, face shield, or safety glasses) when handling. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear long-sleeved shirt and long pants, chemical resistant gloves made of waterproof material, socks, shoes, protective eyewear, chemical-resistant headgear for overhead exposure, chemical-resistant apron when mixing or loading. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. 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 CONTROL 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.

ENVIRONMENTAL HAZARDS

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 contaminate water used for irrigation or domestic purposes. Do not contaminate water when disposing of equipment wash waters. Do not apply when weather conditions favor drift from areas treated.

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 regulations.

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), 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 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 over long-sleeved shirt and long pants, chemical resistant gloves made of waterproof material, chemical resistant footwear plus socks, chemical resistant head-gear for overhead exposure, and protective eyewear.

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

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Keep container tightly closed when not in use.

PESTICIDE STORAGE INSTRUCTIONS: Do not store in or around the home. Storage should be under lock and key and secure from access by unauthorized persons, children and animals. Do not use or store near heat, open flame or hot surfaces. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Carefully open containers. After partial use, replace lid and keep container tightly sealed. Avoid contamination with acids and alkalis. Store in original containers only.

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.

CONTAINER DISPOSAL: Empty containers must be triple rinsed into the spray tank during the spray operation. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL USE PRECAUTIONS

Do not apply this product through any type of irrigation system.
Do not graze livestock in treated fields, orchards or treated groves.
Do not feed hay or vines (peanuts) to livestock.
Consult your state experiment station or state extension service for proper timing of sprays.

RESISTANCE MANAGEMENT

It is known that certain plant pathogens might develop resistance to products used repeatedly for disease control. For good resistance management practices, it is recommended to follow the specific use directions on the label. It is essential to alternate SYLLIT FL with other labeled fungicides that have a different mode of action. This management program will prevent the buildup of resistance and will ensure that SYLLIT FL Fungicide can be maintained as a valuable fungicide. Where resistance to SYLLIT FL is known or suspected, use an alternate fungicide for control of the disease.

DILUTE AND CONCENTRATE SPRAYS

SYLLIT FL may be used effectively in dilute and concentrate sprays when applied properly to deliver the recommended rate (pints per acre). Trees must be covered uniformly. Fruit and foliage should not be excessively drenched with dilute sprays. Avoid heavy deposits when using concentrate sprays.

INSTRUCTIONS FOR MIXING

SYLLIT FL should be added directly to the spray tank when half filled with water. Keep agitator running during filling and spraying.

COMPATIBILITY

Experience indicates that SYLLIT FL can be used effectively at recommended dosages with most of the commonly used fungicides, insecticides and acaricides such as: Abamectin EC, Alpha-cypermethrin EC, Bupirimate EC, Carbaryl SC, Cypermethrin EC, Deltamethrin EC, Diazinon EC, Dimethoate EC, Endosulfan EC, Flufenoxuron DC, Hexaconazole SC, Imidaclopryd EC, Malathion EC, Methidation EC, Penconazole EC, Pirimicarb WG, Tau-Fluvalinate EW, Tetraconazole EC. **ATTENTION:** this list of active substances is only indicative and can not be considered as a guarantee given on compatibility. Indeed, due to the high number of formulations available on the market, we always recommend to test the compatibility of the products used in combination with SYLLIT FL at small scale before spraying or to ask your local distributor about potential incompatibility.

While SYLLIT FL has been used satisfactorily with emulsifiable concentrate formulations and flowable (water-based) emulsions, it is desirable to check the compatibility of this type of combination before materials are mixed in the spray tank. SYLLIT FL is not compatible with foliat fertilizer, Dinocab, Captan, Bordeaux mixtures, fixed copper, lime or lime sulfur. Observe all cautions and limitations on labeling of all products used in mixtures. Follow the most restrictive label limitations and precautions. No label dosage rates should

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be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing.

SYLLIT FL AND OIL

Most of the tank-mix combinations of SYLLIT FL and oils have been used effectively as a delayed dormant application on apples. However, SYLLIT FL showed to be incompatible with some oil formulations especially when oils were used at a high rate per acre. Because uniform dispersibility and sprayability may be influenced by the particular oil formulation used or by the local water supply, it is recommended that compatibility be determined before adding pesticides to the spray tank.

PROCEDURE FOR TANK-MIXING SYLLIT FL WITH INSECTICIDES AND OIL

1. SYLLIT FL should be added to the tank when 1/4 to 1/2 full with water and allowed to mix thoroughly.
2. If insecticide is used, add as tank is filling.
3. Add self-emulsifying oil last when tank is nearly 3/4 full.
Consult your state agricultural experiment station or state extension service for information on self-emulsifying oils and pesticide formulations for tank mixing with SYLLIT FL.

APPLE: Scab - Protection Schedule

Ground Application: Use 1.5 to 3 pints per acre of SYLLIT FL at 5 to 7 day intervals or as needed to maintain scab control pre-bloom through the first cover applications. Use 1.5 pint per acre of SYLLIT FL in subsequent cover sprays as needed.

SYLLIT FL may be used in a delayed dormant oil schedule. Use 1.5 to 3 pints of SYLLIT FL with 8 gallons of oil of 60-75 viscosity per acre. For mixing instructions, refer to SYLLIT FL and OIL section on the label.

Air Application: Use 2.4 pints of SYLLIT FL per acre in 5 to 7 gallons of spray at 5 to 7 day intervals or as needed to maintain scab control from pre-bloom through the first cover sprays. Repeat application in subsequent cover sprays as needed.

Apple Scab- "After-Infection" Schedule

After an infection period has occurred, use 4.5 pints per acre of SYLLIT FL during or following a rain from pre-bloom through first cover applications and, in later cover sprays, as needed. While timing of the spray may vary considerably depending upon temperatures, it is recommended that application be made within 36 hours, from the beginning of the rain or wet period which caused the infection.

Do not apply within 7 days of harvest.

SYLLIT FL treated apples must not be used in the manufacture of apple pomace for use in livestock feeds. Such use may result in illegal residues in milk or meat.

Fruit color and finish on most apple varieties sprayed with SYLLIT FL at recommended dosages have frequently been outstanding.

SYLLIT FL may cause russetting of Golden Delicious and Grimes Golden apple varieties if applied during cool, slow drying weather conditions. Do not use on these varieties under these conditions.

Freezing or near-freezing temperatures, particularly when accompanied by slow-drying conditions may injure apple fruit or predispose the fruit to chemical injury. Do not exceed 3 pints of SYLLIT FL per acre immediately before, during or immediately after occurrence of such conditions.

BANANA: Sigatoka (Air application)

Use 1.5 to 3 pints per acre of SYLLIT FL as needed to maintain Sigatoka control through the first cover applications. Repeat application thereafter at 7 to 15 day intervals using 1.5 pints per acre of SYLLIT FL in a mixture of 9 to 18 pints water/acre and 5 to 7 pints mineral oil/acre. It is recommended for subsequent cover sprays to use SYLLIT FL in rotation with other labeled fungicides that have a different mode of action. Do not exceed more than 5 applications per season. SYLLIT FL may be applied up to the day of harvest.

CHERRY (SOUR AND SWEET): Leaf Spot - Use 1.5 to 3 pints of SYLLIT FL per acre at petal fall or when first leaves unfold. Repeat application thereafter at 7 to 10 day intervals. If conditions favor leaf spot, continue applications through harvest.

Post-Harvest Sprays: Apply 1.5 to 3 pints of SYLLIT FL per acre immediately after harvest and as needed.

Blossom Brown Rot (Western States Only): Use 3 pints of SYLLIT FL per acre at the time petals begin to open. Repeat application at full bloom and again at petal fall.

Applications of SYLLIT FL to cherries when temperatures and humidity are excessively high may cause spotting to foliage or fruit.

PEACH: Bacterial Spot - Under light to moderate disease conditions, use 3 pints of SYLLIT FL and 4 lbs. captan (50%) per acre (use 0.8 pint SYLLIT FL and 1 lb. captan (50%) per 100 gallons of spray) at shuck-split and repeat application at 7 to 10 day intervals through the cover sprays. Pay attention to physical compatibility of tank-mix with some captan formulations. Shorten intervals during wet periods as needed to maintain maximum protection against infection.

Do not use concentrate sprays higher than 3x.

Do not apply within 15 days of harvest.

Captan or the Syllit-captan mixture is toxic to fish. Do not contaminate any body of water.

Do not combine SYLLIT FL and captan with solvent formulations of insecticides or sulfur. Spray injury may result if the combination is applied with, immediately before, or closely after an oil or zinc sulfate-lime spray.

PEACH: Leaf Curl (Western States Only) - Use 6 pints of SYLLIT FL per acre just before buds swell in the spring. If leaf curl was moderate to severe the previous season, use 6 pints SYLLIT FL per acre 1 month before buds swell in the spring and again just prior to bud swelling.

Blossom Brown Rot (Western States Only) - Use 3 pints of SYLLIT FL at the time petals begin to open. Repeat applications at full bloom and again at petal fall.

Do not apply after petal fall.

PEANUT: Early Leaf Spot (*Cercospora arachidicola*) and Late Leaf Spot (*Cercosporidium personatum*) - Use a maximum of 1.5 pints SYLLIT FL per acre in sufficient water to achieve thorough plant coverage. Begin applications when disease first appears (roughly 35 days after planting), and repeat at 10 to 14-day intervals. Do not use more than 3 applications per season. Do not apply within 14 days of harvest.

PEAR: Scab (Western States Only) Use 4.5 pints of SYLLIT FL per acre of spray at 5 to 7 day intervals or as needed to maintain scab control from pre-bloom through petal fall and again in first cover. Use 3 to 4.5 pints of SYLLIT FL in subsequent sprays as needed.

Do not make more than six applications per season. A maximum of two applications may be made in the final two months prior to harvest: one made no later than 14 days prior to harvest and the final application made no later than 7 days prior to harvest.

(Air Application - Oregon Only) - Use 3 to 4.5 pints of SYLLIT FL per acre in 5 to 7 day intervals or as needed to maintain scab control from pre-bloom through the first cover sprays. Repeat application in subsequent cover sprays as needed.

Do not make more than six applications per season. A maximum of two applications may be made in the final two months prior to harvest: one made no later than 14 days prior to harvest and the final application made no later than 7 days prior to harvest.

PECANS: Scab, liver spot, brown leaf spot, downy leaf spot, leaf blotch, downy mildew - (Ground Application) - Use 3 to 6 pints of SYLLIT FL per acre of spray. Begin applications when first leaves are showing and repeat at 10 to 14 day intervals through first cover. Repeat applications at 2 to 3 week intervals or as needed to maintain disease control.

(Air Application)- Use 3 pints of SYLLIT FL per acre in a minimum of 20 gallons of spray. Begin applications when first leaves are showing and repeat at 10 to 14 day intervals through first cover. Repeat application at 2 to 3 week intervals or as needed to maintain disease control. Under severe scab conditions, use 6 pints of SYLLIT FL per acre in a minimum of 20 gallons of spray.

Do not apply after shucks have started to open.

SYLLIT FL has been used effectively on most pecan varieties. Severe foliage injury has been experienced on Barton, Moore, Shawnee and Van Deman in the Southeast.

STRAWBERRY: Leaf Scorch, Leaf Spot and Leaf Blight - Use 2.4 to 3 pints of SYLLIT FL per acre in sufficient water (250 - 300 gallons) for thorough plant coverage. Make first application as soon as new growth starts and repeat sprays at weekly intervals. Do not apply within 14 days of harvest.

BLACK WALNUT: Anthracnose (Leaf Blight) - Use 6 pints of SYLLIT FL per acre when first leaves unfold. Repeat application at 10 to 14 day intervals.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of AGRIPHAR. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: AGRIPHAR S.A. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of AGRIPHAR is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. AGRIPHAR DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT AGRIPHAR'S ELECTION, THE REPLACEMENT OF PRODUCT.

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SYLLIT FL (MASTER), approved on 03/11/07
Revised 01/09/07 – proposed label for submission