

09/15/2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SFP 1 5 2006

Mr. Vatren Jurin Agent for Parkway Research ClawEL Specialty Products 211 W, Route 125 Box 350 Pleasant Plains, IL 62677

Subject: Cosan Triple Action 20 EPA Registration No.: 58044-3 Amendment Date: June 15, 2006 EPA Receipt Date: June 19, 2006

Dear Mr. Jurin,

The following amendment submitted in connection with registration under FIFRA, as amended, is unacceptable.

Updated First Aid Statements per PR Notice 2001-1

Label Deficiencies

Revise the label as follows:

Revise the precautionary statements to reflect the toxicity category classification for 1) primary eye irritation by stating "Causes irreversible eye damage and skin irritation." Also, the the statements the proposed label are incomplete, you must add the following text "Do not get in eves, on skin, or on clothing. Wear protective eyewear (goggles or faceshield), rubber gloves, and protective clothing. Avoid breathing sprav mists. Wash hands before eating drinking, chewing gum, or using tobacco. Remove and wash clothing before reuse."

Based on the reassessment of your product's active ingredients for reregistration, the 2) Agency has determined that there are environmental concerns regarding the application method and amount of product used to treat plants in ornamental nurseries. You will need to revise you label by limiting your applications to Spot Treatment of diseased ornamental plants and flowers at a maximum rate of 800 ppm and total use of 5 lbs A.I/ acre. Treatment is restricted to indoor uses or uses in which controlled conditions prevent runoff and exposure to the environment. (what does this sentence refer to?) In the case of diseased trees, the spot treatment of trees must be at least 100 feet from any pond, lake, stream, or river to prevent possible runoff of the product into the waterway. The label will include the statement, "Do Not Apply by Aerial Spray."

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3) In addition to concerns regarding treatment of plants in ornamental nurseries, there are environmental concerns regarding the treatment of commercial turf, golf courses, and lawns. You need to revise your directions to address the following:

For commercial application to golf courses, treatment is be limited to the "Greens and Tees" at a rate of 0.8 lbs A.I./acre (200 ppm) not to exceed treatment of 10 acres (2000 gallons) with retreatment at 10 day intervals not to exceed 6 treatments per year.

For residential application to turf/lawns, application is limited to Spot Treatment of diseased areas of the lawn/turf only at a maximum rate of 6.8 lbs A.I/acre (800 ppm) not to exceed 25 gallons per 1000 sq. ft. Treatment must be repeated up to 6 times a year at 10 day intervals.

4) Revise the "Storage and Disposal" statement to read:

Storage and Disposal

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

Pesticide Storage: You need to develop storage instructions addressing the parameters outlined in PR Notice 83-3.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray or mixture of 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: Proposed language is acceptable.

General Comments

The proposed amendments to update the first aid statements will be acceptable when the above deficiencies are addressed, and five (5) copies of the revised label is submitted.

If you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely,

Velma Noble Product Manager (31) Regulatory Management Branch I Antimicrobials Division (7510C)

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Consan **TRIPLE ACTION**

20

- DISINFECTANT
- SANITIZER
- DEODORANT

- ALGAECIDE
- FUNGICIDE
- BACTERIACIDE
- PLANT VIRUCIDE

FOR USE ON ORNAMENTAL PLANTS, GRASSES AND TREES

ACTIVE	INGREDIENTS:
ACTIVE	INGREDIENTS.

n-alkyl (60% C14, 30% C16, 5% C12, 5% C18)	
dimethyl benzyl ammonium chlorides	%
n-alkyl (50% C12, 30% C14, 17% C16, 3% C18)	
dimethyl ethylbenzyl ammonium chlorides	%
n-alkyl (50% C12, 30% C14, 17% C16, 3% C18)	
dimethyl benzyl ammonium c .lorides	%
OTHER INGREDIENTS	%
TOTAL	%

EPA REG. NO. 58044-3

ACCEPTED

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Design Providences from the second

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WITH COMMENTS in SPA Lotter Dated. EPA EST. NO. 48813-IL-1

NET CONTENTS: 1 Gallon

Manufac bred by: PARKWAY RESEARCH (Logo) A Division of Brandt Consolidated, Inc. (Logo) 211 W. Route 125 • Pleasant Plains, IL 62677 800.44∠.9821

Augulan succession and a uncliced, for the perticide, segistered under EPA Reg. No. 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 detal·e. If you do not understand this label, find someone to explain it to you in detail.)

See side panel for first aid and additional precautions.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: KEEP OUT OF REACH OF CHILDREN. Causes eye damage and skin irritation. Do not get in eyes, on skin or clothing. Avoid breathing spray mists. Do not use on Feeding and Grazing Grasses.

FIRST AID				
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 wash before reuse. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 			
If swallowed:	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. 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 inhaled:	 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 further treatment advice. 			

Have the product container label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

APPLICATORS AND OTHER HANDLERS MUST WEAR:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton.
- Shoes plus socks.
- Protective eyeware.
- Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

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.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. TI en wash thoroughly and put on clean clothing.
- 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. Do not apply directly to fish bearing waters. For terrestrial uses, 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 waters by cleaning of equipment or disposal of wastes. Avoid application to turf areas actively grazed by waterfowl.

Do not discharge effluent containing this product into lakes, streams, ponds estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional Office of EPA.

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 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 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 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.
- Chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton.
- · Shoes plus socks.
- Protective eyeware.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, nurseries, or greenhouses.

Keep Children and Pets Off Treated Lawns until area is completely dry.

Consan Triple Action 20 is a multi-purpose disinfectant for the control of fungal, bacterial and viral ornamental plant pathogens, slime-forming fungi and algae and the odors these organisms may cause. Used as directed, the pesticidal residues of this product are biodegraded by normal soil micro-organisms.

Greenhouse and Plant Propagation Applications

• GREENHOUSE HARD SURFACES: To disinfect hard inanimate surfaces (such as glass, work surfaces, benches, flats, pots, tools, cooler pads, walkways, and walls) add 1/4 fluid ounce (= 1½ teaspoons) Consan Triple Action 20 to one gallon of water. Apply solution with mop, cloth, sponge, or mechanical sprayer so as to wet thoroughly. Allow to remain wet for ten minutes, and then let air dry.

- WORK AREA AND BENCHES: To kill plant disease organisms responsible for root rot, crown rot, botrytis, downy mildew, etc., spray or swab all working surfaces before each work period, and again after work on each plant is completed, with a solution of one tablespoon of Consan Triple Action 20 to one gallon of water.
- FLOWER POTS, BUCKETS AND FLATS: To kill plant disease organisms responsible for root rot, crown rot, anthracnose, mildew, rusts and plant blights, brush or wash used pots, buckets or flats and then soak them in a solution of one tablespoon of Consan Triple Action 20 to one gallon of water for at least 10 minutes.
- CUTTING TOOLS: To disinfect, soak the cutting edges of plant care tools in a solution of one teaspoon of Consan Triple Action 20 to one gallon of water for at least 10 minutes, and use the wet tool on each plant. Repeat the disinfection soak after use on each plant to kill and prevent transmission of plant disease organisms such as stem rot, root rot, Tobacco Mosaic Virus (TMV), and botrytis. Rinse the plant tools in clean water and oil at the end of each work period.
- WALKWAYS: To remove and control heavy algal growth on greenhouse or garden walkways, apply a solution of 1/4 fluid ounce (= 1 & 1/2 teaspoons) Consan Triple Action 20 in one gallon of water with a mop or mechanical sprayer and let stand for at least one hour. Then scrub or wash away dead algae. Apply solution again and let walkway air dry for inhibition of new algal growth. Repeat treatment whenever algal growth returns.
- GARDEN BIRD BATHS: DO NOT USE FOR FISH CONTAINERS! To remove build-up of algal growth from an empty bird bath, apply a solution of one tablespoon Consan Triple Action 20 in one gallon of water with a cloth, sponge or mechanical sprayer and allow to air dry. Brush off dead algae before refilling with water.
- EVAPORATIVE COOLERS: To control bacteria, algae, slime forming fungi and certain plant pathogens which may be circulated through the cooler, treat every other week with one ounce of Consan Triple Action 20 for every 30 gallons of cooler water.
- TREATMENT OF ALGAL BUILD-UP IN OVERHEAD WATERING SYSTEM NOZZLES: To prevent nozzle blockage in greenhouse overhead watering systems (for ornamental plants only) use a solution of one tablespoon Consan Triple Action 20 in one gallon of water. Turn off the overhead watering system and apply the solution to spray heads with a cloth, sponge or mechanical sprayer and allow to air dry for at least one hour before reactivating the watering system.

DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM!

 TREATMENT OF BULBS AND RHIZOMES: To control fusarium basal rot of DAFFODIL, NARCISSUS, HYACINTH, TULIPS, EASTER LILIES, GLADIOLI, and IRIS, clean newly dug corms, bulbs or rhizomes and then soak them for 10 minutes in a solution of 1/4 fluid ounce (= 1½ teaspoons) Consan Triple Action 20 in one gallon of water. Air dry prior to storage and treat again just prior to replanting.

To control **botrytis crown rot** and **gray mold rot** of IRIS, soak rhizomes and 3 to 4 inches of leaf bases for 30 minutes in a solution of two teaspoons Consan Triple Action 20 in one gallon of water and plant treated rhizomes while they are still wet.

• TREATMENT OF PLANT CUTTINGS: To control powdery mildew, crowngall, and gray mold leaf spots on BEGONIA, FUCHSIA, GERANIUM, and CHRYSANTHEMUM, completely immerse cuttings for 5 minutes in a solution of two teaspoons Consan Triple Action 20 in one gallon of water. Plant in sterilized potting soil or in compost which has been completely saturated in the specified Consan Triple Action 20 solution.

To control underground **rotting**, **bacterial leaf spot** and **slimy collar rot** of disease-free CACTUS cuttings, soak entire cutting in a solution of two teaspoons Consan Triple Action 20 in one gallon of water for 5 minutes before planting. Spray rooting cuttings with this same strength solution at 1- to 14 day intervals.

To control development of **rust** on CARNATION, completely immerse cuttings in a solution of two teaspoons Consan Triple Action 20 in one gallon of water for 5 minutes before planting.

• TREATMENT OF SEEDS AND SEEDLINGS: To reduce damping off cf seedlings, place seeds in a flask and completely cover with a fresh solution of one-half tablespoon Consan Triple Action 20 in one gallon of water. Soak for 5 minutes, then drain the Consan Triple Action 20 solution and plant immediately.

To reduce **damping off** problems in commercial operations (**Ornamental plants only**), place seedlings in a flask and completely cover with a solution of one-half tablespoon Consan Triple Action 20 in one gallon of water. Soak

for 5 minutes, and then plant immediately. The Consan Triple Action 20 solution can be reused, but it should be replaced daily or when it becomes visibly dirty.

Plant treated seedlings in sterilized potting medium or in garden soil completely saturated with the Consan Triple Action 20 solution. (In pots or trays, add the one-half tablespoon per gallon solution to the surface of garden soil until it drains through the soil and out bottom of container.)

To control spread of **damping off** in planted seedlings (**Ornamental plants only**), use a mechanical sprayer to thoroughly wet all plant surfaces with a solution of one easpoon of Consan Triple Action 20 in one gallon of water.

To control sporulation and spread of downy mildew in planted seedlings (Ornamental plants only), use a mechanical sprayer to thoroughly wet all plant surfaces with a solution of one ounce (= two tablespoons) Consan Triple Action 20 in three gallons of water. Respray at 5 day intervals until disease is under control.

Control of Plant Diseases on Ornamental Plants

• TREATMENT OF ROSES: Observe good garden sanitation; remove and burn all infected plant parts.

To control **leaf black spot, powdery mildew, rusts** and **stem gall on ROSES**, thoroughly wet all plant surfaces with a solution of one-half tablespoon (1½ teaspoons) of Consan Triple Action 20 in one gallon of water. Apply, during warm weather, by any convenient means at first sign of disease. Repeat in 10- to 14-days, and thereafter as needed. Do not apply during wet, rainy weather.

To control **brown canker** on ROSES, start applications in early Spring when new growth begins to show and continue weekly applications until plants are dormant. Additional applications should be made between periods of extended rainy weather to keep new growth covered.

- TREATMENT OF FLOWERING ANNUALS, PERENNIALS, GARDEN SHRUBS AND TREES: To control
 disease problems on most flowering and ornamental plants, treat with a solution of two teaspoons of Consan
 Triple Action 20 in one gallon of water at the first signs of disease. Observe good garden sanitation; remove and
 burn all infected plant parts.
 - CALENDULAS, CHINA ASTERS, CHRYSANTHEMUMS, DAHLIAS, CREPE MYRTLE, LILAC, and LIVE OAK, can be protected from powdery mildew by spraying with a solution of two teaspoons of Consan Triple Action 20 in one gallon of water when symptoms first appear. Thoroughly wet upper and lower surfaces of all leaves, stems and branches. Spray when leaf buds burst in Spring and repeat every two weeks throughout the mildew season. Spray Live Oak trees at bud break and repeat in April.
 - SNAPDRAGONS can be protected from *Phyllosticta* blight, anthracnose, powdery mildew, downy mildew, stem rot, rusts and wilt diseases by spraying upper and lower leaf surfaces with a solution of two teaspoons of Consan Triple Action 20 in one gallon of water until thoroughly wet. Repeat every 7 to 10 days. To prevent plant disease build-up in the garden, collect and burn plant tops in the Fall.
 - IRIS can be protected from **botrytis leaf spot** by spraying foliage at weekly intervals with a solution of two teaspoons of Consan Triple Action 20 in one gallon of water during the growth season.
 - AUCUBA, DAHLIA, FUCHSIA, GERANIUM, GLADIOLUS, PEONY and PIERIS can be protected from botrytis gray mold, rusts and downy mildew by spraying affected plant parts with a solution of two teaspoons of Consan Triple Action 20 in 1 gallon of water when disease symptoms on new growth are first detected. Remove all dead flowers, leaves or stems before spraying. For rust control, spray with the same solution at one to two week intervals during periods of wet weather, beginning in early Summer. For botrytis control, use a fine mist application of a solution of two teaspoons of Consan Triple Action 20 in 1 gallon of water and lightly spray buds and blossoms two to three times a week.
 - CARNATIONS can be protected from stem rot, canker rot, crown rot, root rot and gray mold rot by thoroughly wetting all plant surfaces with a solution of two teaspoons of Consan Triple Action 20 in one gallon of water at first signs of disease.

For gray mold control, use one or two fine mist applications of a solution of two teaspoons of Consan Triple Action 20 in one gallon of water just before blossoming. Lightly spray buds and blossoms. Infected buds,

blossoms and stems should be collected and burned. Pick off all infected buds, blossoms and stems and burn.

- FUCHSIA, GARDENIA, GERANIUM, and HELIOTROPE can be protected from stem rot and gray mold bud rot with weekly applications of a solution of two teaspoons of Consan Triple Action 20 in one gallon of water, as a fine mist spray or fog, at first signs of disease. Pick off all infected buds, blossoms and stems and burn.
- KALANCHOE, CRASSULA and SEDUM can be protected from root rot, crown rot and crowngall by removing and burning infected plant parts and drenching the remaining plants with a solution of two teaspoons of Consan Triple Action 20 in one gallon of water. Spray plants at weekly intervals thereafter with the solution until the disease is controlled.
- HAWTHORN, HOLLYHOCK and SNAPDRAGONS can be protected from plant rust diseases by a spray
 program utilizing a solution of two teaspoons of Consan Triple Action 20 in one gallon of water. Begin
 disease prevention by good garden sanitation involving removal of all plant debris during the Winter or
 dormant season. Begin the spray program when new leaves appear and before onset of the rainy season,
 taking care to spray the undersides of potentially infected leaves. Hollyhocks should be sprayed at weekly
 intervals when spring growth begins and again in late summer. Treatment for snapdragons should begin
 when plants are set in the garden and repeated at 7-10 day intervals.
- HAWTHORN can be protected from leaf blight and subsequent leaf drop, which may occur after very wet Spring weather, by three spray applications of a solution of two teaspoons of Consan Triple Action 20 in one gallon of water. Make first application as soon as leaves break out of their buds. Spray again when leaves are half grown and for the third time when they reach full size.
- FLOWERING DOGWOOD (Cornus florida) can be protected from anthracnose, leaf blight and leaf spot
 with four applications of a solution of two teaspoons of Consan Triple Action 20 in one gallon of water. The
 first spray should be made when flower buds begin to open and the second as soon as flower bracts have
 fallen. The third spray should be made four weeks later and the fourth in late summer after the flower buds
 for nextSpring are formed. Spray treatments are most effective when made just before rainy periods.
- ASH, SYCAMORE and other susceptible trees can be protected from anthracnose by three spray treatments of all leaf and twig surfaces with a solution of two teaspoons of Consan Triple Action 20 in one gallon of water until they are thoroughly wet. Large trees may require 50-60 gallons of spray for complete coverage. Spray trees when leaf buds start to swell in April and repeat when leaves begin to expand. Make the third application when leaves are about 75% of their full size.
- PALM\$ can be protected from heart rot and penicillium leaf base rot at the first signs of rot by completely
 filling the cup formed by the radiating frond bases at the top center or "heart" of the plant with a solution of
 one fluid ounce of Consan Triple Action 20 in one gallon of water. Repeat the treatment at weekly intervals
 until control of rot disease is achieved.
- CREPE MYRTLE, PEAR and other susceptible FRUIT trees can be protected from bacterial fireblight with
 a solution of one tablespoon of Consan Triple Action 20 in a gallon of water. Spray mist or rinse the
 complete plant. Treat fruit-bearing pear and other fruit-bearing trees only in early Spring and after harvest in
 late fall or while the tree is dormant. Crepe Myrtle and all susceptible ornamental fruit trees should also be
 treated during warm weather, and after pruning. Repeat treatment at two week intervals as needed.
- TREATMENT OF GREENHOUSE AND POTTED HOUSE PLANTS: To control disease problems on most greenhouse ornamentals and house plants, treat with a solution of one teaspoon of Consan Triple Action 20 in one gallon of water at the first signs of disease. Observe good plant sanitation; remove and burn all infected plant parts.

To control the growth of unwanted algae in or on pots containing ornamental plants, grown indoors, in greenhouses or outdoors, use a solution of ¼ fluid ounce (1½ teaspoons) Consan Triple Action 20 in one gallon of water to cover about 40 sq. ft. of surface. Use a mechanical sprayer to thoroughly wet the algal growth. If spray contacts foliage of desirable plants, rinse off within 5 minutes. Repeat treatment whenever algal growth returns.

TREATMENT OF TERRARIUMS: To control algal build-up and cross contamination by plant disease
organisms in terrariums, flasks and bubbles, wipe inside of glass with a towel dampened with a solution of
one teaspoon of Consan Triple Action 20 in 1 gallon of water.

- AFRICAN VIOLETS (Saintpaulia) can be protected from botrytis gray mold rot, bud rot, Downy mildew, powdery mildew root rot or crown rot by complete coverage of foliage with a solution of one-half teaspoon of Consan Triple Action 20 in 1 gallon of water. Coverage can be obtained by spraying, but dipping of the entire plant and pot in the solution is more effective. Repeat treatment every 10 days until control is achieved.
- FERNS, BEGONIAS and GESNARIA can be protected from leaf spot, gray mold bud rot, and shoot rot by spraying with a solution of one teaspoon of Consan Triple Action 20 in 1 gallon of water at first signs of disease. Maintain good plant sanitation by removing all plant debris and dead leaves. For begonias and gesnariads, spray before buds open and respray when flower petals have fallen and again two weeks later.
- RUBBER PLANT can be protected from anthracnose attack of stems and leaves, and from stem crowngall, by removal and burning of infected plant parts at the first signs of disease. Then spray, mist or fog the plant(\$) with a solution of one teaspoon of Consan Triple Action 20 in 1 gallon of water and repeat treatment weekly until control is achieved.
- ORCHIDS can be sprayed once a month with a disinfecting solution of one tablespoon of Consan Triple Action 20 per gallon of water as a fungal preventative. At the first sign of *Erwinia* rot, remove compost and soak the entire plant for at least 10 minutes in the disinfectant. Then remove all infected tissues with a disinfected cutting tool and resoak the cut surfaces in Consan Triple Action 20 disinfectant for an additional 10 minutes. Repot in disinfectant drenched compost. Crown rot (*Phalsenopsis*) can be controlled by weekly applications of a solution of two teaspoons of Consan Triple Action 20 per gallon of water. Cover all surfaces, particularly in and around orchid leaf bases.

When dividing orchids, transmission of plant pathogens can be prevented by removing compost and soaking plants for 2-5 minutes in a disinfecting solution of one tablespoon of Consan Triple Action 20 in one gallon of water. Wet hands and cutting tools with disinfectant before plant division and root trimming. Then resoak divided orchids in disinfectant for an additional 2-5 minutes. Repot in disinfectant drenched compost.

- TREATMENT OF CUT FLOWERS: To control mold and downy mildew development on cut flowers dip harvested plant spikes in a solution of two teaspoons of Consan Triple Action 20 in one gallon of water prior to shipping. To prevent bacterial stem plugging of cut flowers, harden stems in a solution of one teaspoon of Consan Triple Action 20 in one gallon of water following harvest and during storage and shipping in containers, tubes or decorative vases.
- TREATMENT OF LAWNS, GOLF COURSES AND COMMERCIAL TURF: For use in turf grasses, including lawns of GRASS or DICHONDRA, to control algal build-up and to control fungal diseases in turf grasses, including dollar spot (*Sclerotinia*), fusarium blight (*Fusarium*), leaf spot (*Helminthosporium*), brown patch (*Rhizoctonia*), fading-out (*Curvularia*). pythium blight, rust, toad stools, fairy rings and algal build-up spray a solution of one tablespoon Consan Triple Action 20 per gallon of water. Treat at the rate of one gallon of solution to 40 square feet (4 ft. x 10 ft.) of lawn. Treat entire lawn to prevent spread of infection or at least one foot beyond the edges of isolated diseased areas. Saturate the entire treatment area, wetting all plant and soil surfaces. Repeat spray applications every 10 to 14 days, as needed to control new or established disease conditions. Treatment is required during the warm growing season and may be made when the lawn is dry or damp, but not during wet rainy weather.

For golf courses, greens, tees and fairways, and commercial (non-agricultural) turf applications, follow the use directions above. If commercial power sprayers are used, reduce spray concentration to one pint of Consan Triple Action 20 to 50 to 100 gallons of spray mixture to treat 10,000 square feet or ¼ acre.

Not for use on seed or sod farms. Do not graze treated areas or feed clippings to livestock.

DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM!

HARD SURFACE APPLICATIONS

Consan Triple Action 20 is a multi-purpose disinfectant, sanitizer-deodorant for use in homes, nursing homes, hospitals, offices, schools, and institutions.

FOR SANITIZING: USE ONE OUNCE TO EIGHT GALLONS OF WATER (200 PM). FOR DISINFECTING: USE ONE OUNCE TO FOUR GALLONS OF WATER (400 PPM). One Ounce = Two Tablespoons = Six Teaspoons

GENERAL HOME AND OFFICE SURFACES: Use to c.sinfect and deodorize hard surfaces such as floors, walls, garbage carts, locker rooms, tubs and showers, lavatories and toilet seats. Use the disinfecting solution. Apply the disinfecting strength solution (see above) by sponge, mop or spray to thoroughly wet all surfaces and keep wet for 10 minutes. Allow surfaces to air dry and do not rinse. Always clean these surfaces thoroughly before disinfecting.

SCHOOLS AND INSTITUTIONS: Disinfect thoroughly cleaned general surfaces (such as floors, walls, garbage carts, locker rooms, tubs and showers, lavatories and toilet seats) by application of disinfecting strength solution. Apply by sponge, mop or spray to thoroughly wet all surfaces and keep wet for 10 minutes. Allow surfaces to air dry and do not rinse. In addition, use disinfecting solution to scrub shower and locker room floors, benches, mats and other surfaces commonly contacted by the bare feet, to aid in preventing spread of athlete's feet fungi on environmental surfaces. Allow to remain wet for 10 minutes and then let air dry.

NURSING HOMES AND HOSPITALS: Use disinfecting solution to treat previously cleaned lavatories, floors, walls, bed frames and equipment. Thoroughly wet these surfaces with disinfecting solution by wiping, mopping, or scrubbing. Use disinfecting strength solution as a final laundry rinse to provide residual bacteriostatic activity and diaper sanitation. Use the sanitizing strength solution as a spray to deodorize mattresses, pillows and bed pans. Allow to remain wet for 10 minutes and then let air dry.

LAUNDRIES: Consan Triple Action 20 provides residual bacteriostatic activity when used at the disinfecting rate of one fluid ounce to four gallons of water, as determined by the Petrocci and Clark Method for laundry additives. ADD CONSAN TRIPLE ACTION 20 ONLY TO THE FINAL RINSE WATER!

WATER/SMOKE DAMAGE RESTORATION OF POROUS AND SEMI-POROUS MATERIALS

Consan Triple Action 20 is effective against fungi and bacteria causing odors on water damaged rugs, carpets, carpet tiles and carpet pads or cushions, manufactured from wet cleanable or synthetic fibers (not for use on wool), and on subfloors, drywall, trim, framing lumber, tackless carpet strips and wall paneling, in homes, offices, schools and other institutions, industrial sites and in nursing homes and hospitals.

Following damage from a clean water source: Extract excess water. Test hidden area for colorfastness. Dilute Consan Triple Action 20 at a rate of 1 fluid ounce in 2 gallons of water (800ppm) which will allow for the diluting effect of absorbed water within the saturated materials. Remove gross filth of heavy soil. Use proper ventilation at all times. Apply as a coarse spray to saturate all affected materials, then use a roller or stiff brush to distribute the active ingredients. Keep treated materials wet for at least 10 minutes, then extract thoroughly. Do not rinse. Dry rapidly and thoroughly.

Following damage from a contaminated water source (river flooding or sewer backup): Pretreat damaged surfaces with Consan Triple Action 20 diluted to a concentration of 1 fluid ounce of product in 1 gallon of water (1,600ppm). Remove gross filth or heavy soil along with non-salvageable materials and extract excess water. Test for colorfastness. Retreat with a Consan dilution of 1 fluid ounce in 2 gallons of water (800ppm). Use proper ventilation at all times. Apply as a coarse spray to saturate all affected materials, then use a roller or stiff brush to distribute the active ingredients. Keep treated materials wet for at least 10 minutes, then extract thoroughly. Do not rinse. Dry rapidly and thoroughly.

Always test for colorfastness before treating surface. Apply diluted product to a small concealed spot, then rub with a clean white cloth. Do not use this water based product if color of surface transfers to cloth.

INCOMPATIBILITIES: DO NOT MIX CONSAN TRIPLE ACTION 20 WITH COMMON SOAP, DETERGENTS, COMPOUNDS CONTAINING IRON, DYE INDICATORS, OR ANY OTHER ANIONIC MATERIALS.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

(Disposal Instructions for Non-residential/Non-household Use.)

PESTICIDE DISPOSAL: Pesticide spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to Federal or approved state procedures under subtitle C of the Resource Conservation and Recovery Act.

CONTAINER DISPOSAL: Plastic containers — 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.

(Alternate Disposal Instructions – for products labeled for Residential/Household Use – meeting requirements of PR Notice 2001-6.

CONTAINER DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If **partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

GENERAL: Consult Federal, state or local authorities for approved alternative procedures, such as limited open burning.

WARRANTY

Seller's guarantee shall be limited to contents and merchantability of the product and the terms of the label. Buyer assumes any risks to persons or property arising out of use or handling. Because the time, place, rate of applications and other conditions of use are beyond seller's control, seller's liability from storage, handling and use of this product is limited to replacement of product or refund of purchase price.

[Consan Triple Action 20, with Horticultural &/or Surface Applications – Alternative Product Names]

Primary Product Brand Name:

1) Consan® Triple Action 20; includes all Master Label uses, including Agricultural (Non-Food), Non-Agricultural (Horticultural & Turf) & Hard-Surface Applications for the Homeowner.

Alternate Product Brand Names:

- 2) Consan® Triple Action 20 LGH, "Lawn, Garden & Household Fungicide & Algaecide"; includes all Non-Agricultural (Horticultural & Turf) & Hard-Surface Applications for the Homeowner.
- 3) Consan® Turf, "Turf Fungicide & Algaecide"; includes only Non-Agricultural Commercial Turf Applications.
- 4) Consan® Greenhouse, "Greenhouse Hard-Surface Disinfectant"; includes only Non-Agricultural Greenhouse Hard-Surface Applications with uses added by Notification for alternative treatment of spray heads" in spray mist systems.
- 5) Consan® Rose and Crepe Myrtle, "Spray Concentrate"; includes only Non-Agricultural (Horticultural) Applications for control of plant fungal diseases for the Homeowner.