

Reg # 58185-8

PM-25

File  
199



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

FEB 23 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

John A. Francis, Jr.  
GRACE-SIERRA CROP PROTECTION CO.  
REGULATORY AFFAIRS DEPT  
1001 Yosemite Drive  
Milpitas, CA 95035

Subject: Label Amendment Submission of 06/30/93 in Response to PR Notice 93-7  
EPA Reg. No. 58185-8  
TRUBAN FUNGICIDE 25% EMULSIFIABLE CONCENTRATE

**IMPORTANT NOTICE:** This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**SERIOUS ERROR(S) ON SUBMITTED LABELING:**

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

**YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING.** Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

**YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.**



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

299

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director  
Compliance Division, (7203)  
Worker Protection Notification  
Office of Compliance Monitoring  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

3 9

**IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.**

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling as amended

**AND**

- **WITHIN** one year from date of this acceptance.

Submit the final printed labeling via the U.S. Postal Service to:

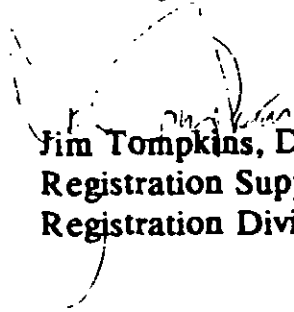
Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

499

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

599

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

John A. Francis, Jr.  
GRACE-SIERRA CROP PROTECTION CO  
REGULATORY AFFAIRS DEPT  
1001 YOSEMITE DR  
MILPITAS CA 95035

Comment for: EPA Reg Nr.58185-8  
TRUBAN FUNGICIDE 25% EMULSIFIABLE CONCENTRATE

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

The respirator requirement for "applicators and other handlers" in the Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "For exposures outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). For exposures in enclosed areas, a respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)." The exact location is shown in Sections A and B on Part I of the product Worksheet in Supplement Three-A to PR Notice 93-7.

699

**TRUBAN®**  
**FUNGICIDE**  
**25% Emulsifiable Concentrate**

**For control of damping-off, root and stem rot diseases caused by  
Pythium and Phytophthora in ornamental and nursery crops.**

**ACTIVE INGREDIENTS:**

5-Ethoxy-3-trichloromethyl-1,2,4-thiadiazole\* ..... 25%

**INERT INGREDIENTS** ..... 75%

**TOTAL**..... 100%

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 23 1994

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
58185-8

**KEEP OUT OF REACH OF CHILDREN**  
**DANGER PELIGRO**  
CORROSIVE. CAUSES EYE DAMAGE AND SKIN  
IRRITATION. HARMFUL IF SWALLOWED.

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 IN EYES:** Flush eyes immediately with plenty of water for at least 15 minutes. **Get medical attention.**

**IF SWALLOWED:** Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. **Call a physician immediately.**

**IF INHALED:** Induce coughing immediately.

**IF ON SKIN:** Wash thoroughly with soap and water. If irritation persists, **get medical attention.**

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

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS**

\* Licensed under U.S. Patents No. 3,260,588 and 3,260,725

**EPA REG. NO. 58185-8**

**EPA EST. NO. 228-IL-1**

4326

GRACE / SIERRA

1 QT (0.95 L)

Grace-Sierra Crop Protection Company • 1001 Yosemite Drive, Milpitas, CA 95035

799

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER!** Corrosive, causes eye damage and skin irritation. **IF IN EYES**, immediately flush with plenty of water for at least 15 minutes. **GET MEDICAL ATTENTION.** Do not get in eyes, on skin or clothing. ~~Wear goggles or face shield and rubber gloves when handling.~~ Harmful if swallowed, inhaled or absorbed through skin. Avoid inhalation of spray mist. In case of contact, immediately flush eyes or skin with plenty of water. If in eyes, see a physician. If skin irritation develops, get medical attention. ~~Wash contaminated clothing before reuse.~~ Do not contaminate feed or food. ~~Keep children and pets out of treated area until dry.~~

### Personal Protective Equipment

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

**Applicators and other handlers must wear:**  
Coveralls over short-sleeved shirt and short pants  
Chemical-resistant gloves, such as barrier laminate or viton...  
Chemical resistant footwear plus socks...  
Protective eyewear  
Chemical-resistant headgear for overhead exposure  
Chemical-resistant apron when cleaning equipment, mixing, or loading

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. 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. Then 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 PRODUCT IS TOXIC TO FISH.** Do not apply directly to water or wetlands. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes.

### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

### 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

8 9 9

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 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 short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate or Viton
- Chemical resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

irrigation system unless the supplemental labeling on chemigation is followed.

### FOR PROFESSIONAL USE ONLY

TRUBAN is a soil fungicide for control of damping off, root and stem rot diseases caused by Pythium and Phytophthora. It may be used at time of seeding and transplanting as a drench for control of these problem fungi in greenhouses and outdoors.

TRUBAN suspensions in water should be occasionally agitated to assure uniform application of material. TRUBAN suspensions need not be protected from light. Use at recommended rates. Overdosage may result in toxicity to sensitive plants. If plants are suspect of being sensitive, apply fungicide to a small number to insure safety. TRUBAN should not be mixed with other pesticides or nutrients.

### CHEMIGATION

Refer to supplemental labeling entitled CHEMIGATION INFORMATION for use directions for chemigation. Do not apply this product through any

Thoroughly rinse TRUBAN residues out of all equipment after use. ~~Always use protective clothing and respirator when mixing and applying pesticides.~~

### STORAGE AND DISPOSAL

**STORAGE:** Not sensitive to light. Stable at normal temperatures and humidities.

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

**PESTICIDE DISPOSAL:** Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, State or local procedures.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then dispose of in a sanitary landfill or by other approved State and local procedures.



9 9 9

PLANT TYPE			REMARKS
<b>Bedding Plants</b>			<b>BEDDING PLANTS (soil 2" to 3" deep)</b> Mix 3-4 oz. of TRUBAN 25% E.C. with 100 gal of water and apply to 800 sq ft of bed area (1 gal per 8 sq ft) and use at time of seeding and transplanting. Irrigate immediately with additional water equal to at least half the volume of the fungicidal drench for improved soil penetration of the fungicide. Re-treat at 4 to 8 week intervals if additional applications are necessary.
Ajuga	Dahlia	Phlox	
Alyssum	Dianthus	Salvia	
Calendula	Dusty Miller	Snapdragon	
Celosia	Larkspur	Verbena	
Cineraria	Marigold	Vinca	
Chrysanthemum	Pansy	Zinnia	
Coleus	Petunia		
<b>Foliage Plants</b>			<b>BED AND BENCH PLANTINGS OF TROPICAL FOLIAGE PLANTS (Peat and other high organic growth media 6" deep)</b> Mix 4-8 oz. of TRUBAN 25% E.C. with 100 gal of water and apply to 400 sq ft of bench area. Irrigate immediately with additional water equal to at least half the volume of the fungicidal drench for improved soil penetration of the fungicide. Re-treat at 2 to 3 month intervals to maintain disease control.
Aglaonema	Crassula	Peperomia	
Anthurium	Dieffenbachia	Philodendron	
Areca Palm	Gynura	Pilea	
Brassia	Hedera	Pothos	
Cactus	Hoya	Sansevieria	
Caladium	Maranta	Stromanthe	
Calathea	Nephrolepis	Zygocactus	
Chamaedorea	Nephtytis		
Chinese Evergreen			
<b>Container &amp; Bedgrown</b>			<b>CONTAINER AND BEDGROWN PLANTS</b> Mix 4-8 oz of TRUBAN 25% E.C. with 100 gal of water per 400 sq ft or apply in sufficient amount to saturate the soil mixture, such as 1/2 pint per 6" pot. Irrigate immediately with additional water equal to at least half volume of fungicidal drench for improved soil penetration of the fungicide. Re-treat at 4 to 12 week intervals if necessary.
<b>HERBACEOUS</b>		<b>WOODY</b>	
African Violet	Azalea	Red Pine	
Chrysanthemum	Boxwood	Rhododendron	
Easter Lily	Euonymus		
Geranium	Ficus		
Gerbera	Juniper		
Kalanchoe	Maple		
Poinsettia	Pieris		
Sinningia	Podocarpus		

### WARRANTY

This material conforms to the description on the label and is reasonably fit for the purposes referred to in the directions for use. Timing and method of application, weather, watering practices, nature of soil or potting medium, the disease problem, condition of the crop, incompatibility with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage, or handling of this material not in strict accordance with the directions given herewith. NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY IS MADE.

Proper Shipping Name - COMBUSTIBLE LIQUID N.O.S. (Petroleum Aromatic Hydrocarbons)

NA1993

TRUBAN® is a registered trademark of Grace-Sierra Crop Protection Company for its brand of Fungicide products

0193/PP/3000