

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

SEP 2 8 2007

Sheila R. Kendrick Manager, Federal Registrations Scotts Sierra Crop Protection Company 14111 Scottlawn Road Marysville, OH 43041

Subject: Banrot Broad Spectrum Fungicide 40% Wettable Powder EPA Reg. No. 58185-10 Your amendment dated August 31, 2007 EPA Decision Number 321797

Dear Ms Kendrick:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

- 1. In the first aid box, list an actual toll free emergency medical response phone number.
- 2. In the list of ingredients line up the numbers.

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supercedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

EPA determined that you fulfilled the requirements of the etradiazole RED for the subject product provided the required changes are made to the label. However, we are unable to reregister the product under FIFRA 4(g)(2)(c) at this time since it also contains the active ingredient thiophanate-methyl for which reregistration eligibility decision EPA-HQ-OPP-2005-0284 was signed in November 2004. This product will be reregistered once the data requirements have been satisfied for this product under the thiophanate-methyl RED.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

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

Enclosure

FRONT:

with COMMENTS In EPA Letter Dated al Insection usi Rodenticide an amended, for the posticide **Banrot Broad Spectrum** registered under EPA Reg. No. **Fungicide 40% Wettable Powder** EPA Reg. No. 58185-10

ACCED

• For use in commercial greenhouses to control of damping-off and stem rot diseases of ornamental and nursery crops caused by phthium and phytophthora.

NET WEIGHT 2 lb.

KEEP OUT OF THE REACH OF CHILDREN WARNING AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detaille. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

<u>If in eyes</u>: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

<u>If on skin</u>: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

<u>If swallowed</u>: 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.

<u>If inhaled</u>: 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 or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency call toll free [telephone number].

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

SEE BACK/SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS. Carefully read and follow attached labeling for directions for use.

Front Panel (Cont.)	-
ACTIVE INGREDIENT: 15% Etridiazole: CAS Reg. # 2593-15-9 15% Thiophanate-Methyl: CAS # 23564-05-8 60 % INERT INGREDIENTS 60 % Total 100 %	25%

EPA Reg. No. 58185-10

EPA Est. No. 228-IL-1

Distributed by:

Scotts-Sierra Crop Protection Company 14111 Scottslawn Road Marysville, OH 43041

[Note to PM: End of Front Pantel]

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR part 170. Refer to supplemental labeling under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Cause substantial but temporary eye injury. Harmful is absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

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 A on an EPA chemical-resistant category selection chart.

Loaders, applicators, and other handlers involved in dry applications to potting soil must wear:

- goggles or face shield
- long-sleeved shirt and long pants,
- socks and shoes
- chemical-resistant gloves made of any waterproof material
- NIOSH-approved respirator with:
 - an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or

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- a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or
- a NIOSH approved respirator with an OV cartridge or canister with any N², R, P, or HE prefilter

All other mixers, loaders, applicators and handlers must wear:

- goggles or face shield
- coveralls over long-sleeved shirt and long pants,
- chemical-resistant gloves made of any waterproof material
- chemical-resistant footwear plus socks,
- NIOSH-approved respirator with:
 - 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), or
 - a NIOSH approved respirator with an OV cartridge or canister with any N, R, P, or HE prefilter
 - chemical-resistant apron when mixing, loading, cleaning equipment

Discard clothing or 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 exist, 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/PPE 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 to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Etridiazole can contaminate surface water through spray drift. Under some conditions, etridiazole may have a high potential for runoff into surface eater for several weeks postapplication. These conditions include poorly draining or wet soils with readily visible slopes toward adjacent surface water, frequently flooded areas, areas, overlaying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent waters with vegetated filter strips, and areas overlaying tile drainage systems that drain surface water.

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. Do not allow this product to drift. Do not graze treated areas. Do not feed clippings to livestock.

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 Workers 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 12 hours.

INDOOR RESTRICTIONS: Entry (including early entry that would otherwise be permitted under the WPS) into greenhouses, potting sheds, and other indoor areas by any person – other than a correctly trained applicator who is performing a handling task permitted by the WPS and who is wearing the required handler PPE including a respirator – is PROHIBITED in the entire enclosed structure/building from the start of application until application is complete and one of the following ventilation criteria (providing outdoor air) is met: 10 air exchanges; (2) 2 hours of fans or other mechanical ventilation providing outdoor air; (3) 4 hours of vents, windows, or other passive ventilation; (4) 11 hours with no ventilation followed by 1 hour of mechanical ventilation; (5) 11 hours of no ventilation followed by 2 hours of passive ventilation; or (6) 24 hours with no ventilation. After ventilation criteria are met and until the REI expires, do not enter or allow worker entry into treated areas, except as provided in the WPS. Note: after the expiration of the REI whenever etridiazole-treated soil or planting media is being handled or distributed indoors, continuous ventilation of the area is required at a minimum rate of one complete air exchange per hour.

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EXCEPTION: If the product is soil-injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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 made of any waterproof material

--shoes plus socks

ORNAMENTALS AND NURSERY CROPS

For use in commercial greenhouses only. Use in residential greenhouses or other indoor plant sites is prohibited.

Banrot Broad Spectrum Fungicide 40% Wettable Powder is a soil fungicide for the control of damping-off, root and stem rot diseases caused by Pythium and Phytophthora. It may be used at time of seeding and transplanting either mixed into the growing medium or as a drench to control the labeled pathogens in commercial greenhouses.

Banrot Broad Spectrum Fungicide 40% Wettable Powder suspensions in water should be constantly agitated to assure uniform mixing and application. Banrot Broad Spectrum Fungicide 40% Wettable Powder suspensions need not be protected from light. Use at specified rates and concentrations. Overdosage may result in toxicity to sensitive plants. If plants are suspect of being sensitive, apply fungicide to a small number to insure safety. Banrot Broad Spectrum Fungicide 40% Wettable Powder should not be mixed with other pesticides or nutrients unless adequately tested first.

Thoroughly rinse Banrot Broad Spectrum Fungicide 40% Wettable Powder residues out of all equipment after use.

CHEMIGATION

Refer to supplemental labeling entitled Chemigation Information for use directions for chemigation. Do not apply this product through any irrigation system unless the supplemental labeling on chemigation is followed.

	PLANT TYP	E	REMARKS
BEDDING PLANTS Ageratum Alyssum Aster Balsam Begonia Calendula Carnation Celosia	Coleus Dahlia Dianthus Foxglove Impatiens Larkspur Marigold Pansy	Petunia Portulaca Salvia Snapdragon Stokesia Verbena Vinca Zinnia	BEDDING PLANTS (soil 2" to 3" deep). Mix 4-8 oz. of Banrot Broad Spectrum Fungicide 40% Wettable Powder with 100 gal. of water and apply to 800 sq. ft. of bed area (equivalent to 1 quart/sq. ft soil surface) 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.
FOLIAGE			BENCH PLANTINGS OF TROPICAL

PLAN	T TYPE	REMARKS
PLANTS		FOLIAGE PLANTS (peat and other high
	Peperomia	organic growth media 6" deep or more).
Aglaonema	Philodendron	Mix 6-12 oz. of Banrot Broad Spectrum
Anthurium	Pilea	Fungicide 40% Wettable Powder with 100
Brassaia	Pothos	gal. of water and apply to 400 sq. ft. of
Caladium	Zygocactus	bench area (equivalent to 1 quart/sq. ft of
Chinese Evergreen		soil surface). Irrigate immediately with
Dieffenbachia		additional water equal to at least half the
Echeveria		volume of the fungicidal drench for
Nephthytis		improved soil penetration of the fungicide.
		Retreat at 8 to 12 week intervals to
		maintain disease control.

CONTAINER & BEDGROWN

HERBACEOUS

African Violet Begonia Calceolaria Carnation Chrysanthemum Daphne Easter Lily Geranium Gerbera Gysophilia Heather Orchids Sinningia Statice

BEDGROWN PLANTS

Mix 6-12 oz of Banrot Broad Spectrum Fungicide 40% Wettable Powder with 100 gal. Of water per 400 sq. ft (equivalent to 1 quart/sq. ft soil surface) or apply in sufficient volume to saturate the soil mixture. Re-treat at 4 to 12 week intervals if necessary.

CONTAINER & BEDGROWN PLANTS

Mix 6-12 oz. of Banrot Broad Spectrum Fungicide 40% Wettable Powder with 100 gal. of water per 400 sq. ft. (equivalent to 1 quart/sq. ft soil surface) or apply in sufficient volume to saturate the soil mixture, such as ½ pint per 6" pot. 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 12 week intervals if necessary with a 6-12 oz per 100 gal. rate.

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	PLANTTYP	E	REMARKS
WOODY Arborvitae Arctostaphyf os Camellia	Juniper Laurel Leucothoe Ligustrum	Poinsettia Rhamnus Rhododendr on	
Carissa Ceanothus Fir Hemlock	Magnolia Norfolk Island Pine	Southern Pine Western Pine Yew	
		edlings only. splanting and coffee bean	SEED BEDS PRIOR TO SOWING SEED - Mix 4 ounces (113 grams) of Banrot Broad Spectrum Fungicide 40% Wettable Powder with 50 gallons (190 liters) of water and apply one gallon (3.8 liters) per meter ² (1.2 square yards) two days prior to sowing seeds, thoroughly wetting the planting medium. SEEDS PREVIOUSLY SOWN – Mix 3 ounces (8.5 grams) of Banrot Broad Spectrum Fungicide 40% Wettable Powder with 50 gallons (190 liter) of water. Apply 1.7 oz. (50 cc) of the mixture to 1 quart (a liter) per 1.2 sq. yd. (meter ²). If seedlings have emerged, follow application immediately by irrigating, with the additional water equal to at least ½ the volume of the fungicidal drench for improved soil penetration and to rinse foliage. Re-treat at 4 – 12 week intervals if necessary.

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PLANT TYPE	REMARKS
CONTAINERIZED CITRUS	CONTAINER SEEDLINGS
SEEDLINGS AND LINERS	
(Propagation)	Mix 170 grams (6ounces) of Banrot Broad
"NOTE: For non-bearing seedlings and	Spectrum Fungicide 40% Wettable Powder
liner use only. Do not apply after field	with 190 liters (50 gallons) of water.
transplanting and within two years of the	Apply 50 cc (1.7 oz) of this mixture to a 1
first citrus fruit harvest. Do not apply to	liter (1 quart) container. Follow-up
fruit bearing citrus trees."	application by immediately irrigating with
	additional water equal to at least $\frac{1}{2}$ the
	volume of the fungicidal drench for
	improved soil penetration and to rinse
	foliage. Re-treat at 4 to 12 week intervals
	if necessary

CONTAINERIZED SEEDLINGS AND LINERS

Mix 6-10 oz of Banrot Broad Spectrum Fungicide 40% Wettable Powder in 100 gal water and apply to 800 sq. ft of bench area (1 pint of solution per sq. ft) at one and two month after seedling. With seedlings scheduled for planting in ground liner beds out-of-doors, apply an additional drench, in the greenhouse, 1 to 2 weeks prior to field liner bed planting.

With plants scheduled for replanting to larger containers in greenhouse culture for the bedding process, apply an additional drench upon transplanting. Mix 6 - 10 oz Banrot Broad Spectrum Fungicide 40% Wettable Powder with 100 gal. water per 400 sq. ft. Retreat at 6 to 12 week intervals if necessary. Discontinue any applications 2 months prior to grove planting

Follow-up all applications by irrigating with additional water equal to at least $\frac{1}{2}$ the volume of the fungicidal drench for improved penetration and to rinse foliage.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Not sensitive to light. Stable at normal temperatures and humidities. Store in a secure dry place at temperature above 45°F (7°C) in a well-closed container.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be used 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: Triple rinse (or equivalent). Then offer for recycling, reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

IMPORTANT NOTICE: DISCLAIMER AND LIMITATION OF LIABILITY

This product has been researched to provide necessary data to support its uses on ornamentals and nursery crops. However, tests may not have been carried out on all varieties under all growing conditions on all plants listed on this label. The user must always follow the label directions and exercise his judgement and caution when using the product on a given variety until familiar with the results under his growing conditions. NO WARRANTY OR REPRESENTATION IS MADE, EXPRESS, OR IMPLIED CONCERNING THE RESULTS TO BE OBTAINED FROM THE USE OF THIS PRODUCT IF NOT USED IN ACCORDANCE WITH DIRECTIONS. To the extent consistent with applicable law, the exclusive remedy of the user and Buyer, and limit of liability of either The Scotts Company or its affiliates, for any and all losses, injuries and damages resulting from the use or handling of this product involved. The Buyer and all users are deemed to have accepted the terms of this Notice which may be varied only by agreement in writing, signed by a duly authorized representative of The Scotts Company.

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CHEMIGATION INFORMATION

Chemigation is prohibited in the state of California.

INTRODUCTION

Pesticide labels contain Directions For Use that are necessary for effecting the purpose for which the product is intended. Further, they protect health and environment risks of pesticide contamination of ground water and decrease direct human exposure to pesticide-treated irrigation water.

Apply this product only through pressurized drench (flood), sprinkler, or drip (trickle) irrigation systems. Do not apply this product through any other type of irrigation systems.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers, or other experts.

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

Should the need arise, 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 adjustments.

Pressurized Drench (Flood) System

Systems utilizing a pressurized water and pesticide injection system must meet the following requirements:

- 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 backflow.
- The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- Systems using a gravity flow pesticide dispensing system must meter the pesticide into the water at the head of the field and downstream of a hydraulic discontinuity such as a drop structure or weir box to decrease potential for water source contamination from backflow if water flow stops.
- The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlocked 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.

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 backflow.

- 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 also 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.

Drip (Trickle) 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 backflow.

- 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 also contain a functional, normally closed, solenoidoperated 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.

General Information

Pesticide supply tanks are recommended for the application of these products. See label instructions for dilution use rates and timing of application. For emulsifiable concentrates – agitate prior to use. For wettable powders – agitate continuously during application.

GENERAL INFORMATION

Banrot Broad Spectrum Fungicdie 40% Wettable Powder provides broad spectrum disease control on containerized woody, flowering, herbaceous, and tropical foliage ornamental plants, trees, ornamentals in the plantscape, and turfgrasses.

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

Add required amount of Banrot Broad Spectrum Fungicdie 40% Wettable Powder after adequate shaking to partially filled tank agitated by mechanical or hydraulic means, and then add remaining required amount of water. Continuous agitation is recommended to keep the material in suspension. Make fresh daily.

Apply Banrot Broad Spectrum Fungicdie 40% Wettable Powder with ground equipment, using sufficient volume of spray to provide thorough coverage. Do not tank mix with copper containing materials or with highly alkaline pesticides, such as Bordeaux mixture or lime sulfur. No claim of compatibility with other pesticides is implied. Use the higher concentration or rates under conditions of severe disease pressure or when application intervals are shorter than 14 days due to persistent rainfall. Also, see local State Extension Service Recommendations for application schedules.

IMPORTANT: If, after using Banrot Broad Spectrum Fungicdie 40% Wettable Powder as recommended, treatment is not effective, a tolerant strain of fungus may be present. Consult your local Scotts representative or distributor, your State Agricultural Experiment Station or your State Agricultural Extension Service for advice on the prompt use of some other labeled fungicide.