

61842-6

07-13-2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Dawn Kominski
Tessengerlo-Kerley, Inc.
PO Box 15627
Phoenix, AZ 85060

JUL 13 2010

Subject: Sectagon 42
EPA Reg. No. 61842-6
Metam Alliance's Request on Your Behalf to Amend Label

Dear Ms. Kominski:

In the Agency letter of May 13, 2010, the Agency approved amended labeling for this registration with the condition that specific label revisions be made to the May 13, 2010 label stamped "Accepted with Comments". This letter further amends the May 13, 2010 letter by revising the label comments and by requiring additional changes.

1. (Label p.3) (EPA Comment 4-b) (Alliance issue #17)
Replace EPA's comment with this text:
 - In the "User Safety Requirements" section, add the following sentences: "DO NOT transport contaminated clothing inside a closed vehicle unless stored in a sealed container. Wash or dispose as specified."
2. (Label p.5) (Alliance issue # 1)
At the end of the "Directions for Use" section add the following sentence: "Do not apply when wind speed favors drift beyond the area intended for treatment."
3. (Label p.4) (EPA Comment 5-a) (Alliance issue # 3)
Disregard EPA's comment to add additional California restrictions back on the label.
4. (Label p.6) (EPA Comment 7-a) (Alliance issue #7)
Replace EPA's comment with this text:
 - At the end of the "Protection for Handlers" section, add the following sentence: "Cartridges or canisters must be replaced when odor or irritation from this product becomes apparent, if the measured concentration of MITC is greater than 6000 ppb, or after 8 hours of use, whichever occurs first."

5. (EPA Comment 9-g) (Alliance issue # 9)
Disregard EPA's comment about air temperature.

6. (Label pages 16 and 17) (Alliance issue # 8)
 - In the wind speed section of the "Center Pivot" section, replace the first two bullets with the following:
 - For sprinkler or **center pivot** applications: 1) not using a solid stream type nozzle, OR 2) having a release height or spray height greater than 4 feet, OR 3) having 30 lbs or greater PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 10 mph.

 - For sprinkler or **center pivot** applications using 1) a solid stream, AND 2) having release height and spray height less than 4 feet, AND 3) having 29 lbs. or less PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 25 mph.

7. (Multiple label pages) (Alliance issue # 12)
In the "Soil Conditions" sections of Solid Set Sprinkler; Drench; and Drip, Flood Basin, Furrow and Border applications, the first bullet must be revised to the following:
 - "Soil must be in good tilth and free of large clods. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone, tillage to fracture these layers must occur. The soil must be tilled prior to the application, at a minimum to the depth of the treatment zone."

8. (Multiple label pages) (Alliance issue # 51)
Under the "Application and Equipment Considerations" sections of the Center Pivot; Solid Set Sprinkler; Drench; Drip; and Flood Basin, Furrow and Border applications revise the statement as shown:
 - "Tanks must be ~~inspected, in good condition, and not past their life expectancy~~ to ensure product does not spill or leak."

9. (Multiple label pages) (Alliance issue # 52)
Under the "Application and Equipment Considerations" sections of the Center Pivot; Solid Set Sprinkler; Drench; Drip; and Flood Basin, Furrow and Border applications revise the statement as shown:
 - "The system must contain a functional check valve, vacuum relief valve, inspection port, and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow."

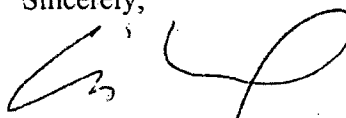
10. (Label p.26) (Alliance issue # 42)
Add the following to the "Application and Equipment Considerations" section of the GAP for Drip Application method:
 - "Nozzles and metering devices are of correct size and are sealed and unobstructed."

11. (Label p.39) (Alliance Issue # 19B)
Delete the Tarp Method section.

12. (Label pages 41 and 42)
Verify that the warranty and disclaimer language is up to date. See the link below for further information.
<http://www.epa.gov/oppfead1/labeling/lrm/chap-12.htm#IX>

The label associated with these changes has been previously stamped "Accepted with Comments" and is dated May 13, 2010. Submit one copy of the final printed label that incorporates the required changes before the product is released for shipment. If you have any questions, please contact Cathryn O'Connell by phone at (703) 308-0136 or via email at occonnell.cathryn@epa.gov or Erik Kraft by phone at (703)308-9358 or via email at kraft.erik@epa.gov.

Sincerely,



Erik Kraft
Acting Product Manager (20)
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