

PM 21 62719-95

10/11



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

DEC 10 1993

Merlyn L. Jones
DOWELANCO
Quad IV 9002 Purdue Rd
Indianapolis, IN 46268

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/23/93 in Response to PR Notice 93-7
EPA Reg. No. 62719-95
PIPRON L.C.

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

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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.

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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.

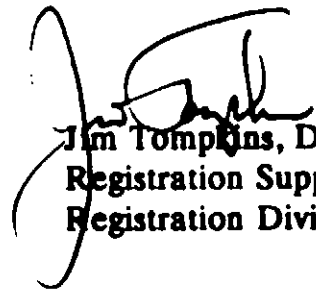
Submit the final printed labeling via the U.S. Postal Service to:

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

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

6/23/93

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(Editor's note: Deleted text indicated by strike-through and added text underlined.
EPA copy dated (copy send to me is illegible.) and text required by the worker
protection standard)
(base label):

(logo) DowElanco

Pipron*
Liquid Concentrate

A Fungicide To Control Powdery Mildew On Ornamentals. For Use Only In Commercial Greenhouses.

Active Ingredient:

piperalin: 3-(2-methylpiperidino)propyl
3,4-dichlorobenzoate. 84.4%

Inert Ingredients. 15.6%

Contains 2 pounds of active ingredient per quart.

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

WARNING

AVISO:

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.)

Causes Substantial But Temporary Eye Irritation • Harmful If Swallowed, Inhaled, Or Absorbed Through The Skin

~~Avoid breathing vapors and spray mist. Do not get in eyes or on skin or clothing. Wear goggles or face shield and protective clothing such as coveralls, a long-sleeved shirt, and impermeable gloves when handling this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.~~

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 F on an EPA chemical resistance category selections chart.

Applicators and other handlers (other than mixers or loaders) must wear:

- Coveralls over a long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, 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.

ACCEPTED
with COMMENTS
to EPA Letter Dated

DEC 10 1993

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

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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.

First Aid

If in eyes: Flush eyes with plenty of water. Get medical attention if irritation develops.

If on skin: Wash with plenty of soap and water. Get medical attention if irritation develops.

If inhaled: If discomfort occurs, remove individual to fresh air. If breathing difficulty occurs, get medical attention. If not breathing, provide cardiopulmonary resuscitation and get medical attention immediately.

If swallowed: Do not induce vomiting. Call a physician or Poison Control Center. If available, administer activated charcoal (6-8 heaping teaspoons) with a large quantity of water. Do not give anything by mouth to an unconscious person. Immediately transport to a medical care facility and see a physician (see "Note to physician").

Note to physician: This product contains an aromatic hydrocarbon and can be extremely harmful if swallowed. Aspiration of this product may produce a severe pneumonitis. Stomach lavage with a cuffed endotracheal tube in place and immediate administration of activated charcoal 6-8 heaping teaspoons with water, should be considered. Treatment is otherwise symptomatic and supportive.

Environmental Hazards

Do not apply directly to water or wetlands. Do not contaminate water, food or feed by storage or disposal. Do not contaminate water when disposing of equipment washwater.

Refer to label booklet for additional precautionary information including Personal Protective Equipment (PPE), and Directions for Use including Agricultural Use Requirements and Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies" in the enclosed label booklet.

In case of emergency endangering health or th environment involving this product, call collect 517-636-4400.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-95

AGH MM XI
EPA Est. 5905-GA-01; 464-MI-1; 52379-MI-002
Superscripts correspond to first letters of lot number.

20160

900-000xxx

*Trademark of DowElanco
DowElanco • Indianapolis, IN 46268, U.S.A.

Specialty Fungicide

Net Contents

(cover)

(logo) DowElanco

Pipron*

Liquid Concentrate

A Fungicide To Control Powdery Mildew On Ornamentals. For Use Only In Commercial Greenhouses.

Active Ingredient:

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Specialty Fungicide

Net Contents

(page 1 through end)

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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 F on an EPA chemical resistance category selections chart.

Applicators and other handlers (other than mixers or loaders) must wear:

- Coveralls over a long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, 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.

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Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
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Environmental Hazards

Do not apply directly to water or wetlands. Do not contaminate water, food or feed by storage or disposal. Do not contaminate water when disposing of equipment washwater.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

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 exemptions 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 24 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 a long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber or Viton
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

Storage and Disposal

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

Storage: Store in original container only. In case of leak or spill, use absorbent materials to contain liquids and dispose as waste.

Pesticide Disposal: Wastes resulting from the use of the product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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General Information

Pipron for the Control of Powdery Mildew
Pipron Liquid Concentrate fungicide is highly effective against powdery mildew-causing fungi attacking rose, lilac, dahlia, phlox, zinnia, chrysanthemum, catalpa. Used as directed Pipron Liquid Concentrate will not harm foliage or floral tissue.

General Use Precautions

Do not enter treated areas without protective clothing until sprays have dried.
Do not apply this product through any type of irrigation system.

Application Directions

Pipron Liquid Concentrate plus surfactant is to be mixed with water and applied as a spray to the foliage of ornamental plants. Sufficient pressure should be used in spraying Pipron Liquid Concentrate to ensure thorough coverage of all plant surfaces. Special care should be taken to thoroughly wet new terminal growth and plant areas already diseased with powdery mildew.

Mixing: Pour the recommended amount of Pipron Liquid Concentrate and surfactant into the spray tank during filling and mix thoroughly before spraying.

Rates and Spraying Schedule: To control powdery mildew, add to each 100 gallons of water 1/4 to 1/2 pint of Pipron Liquid Concentrate plus 2 to 4 ounces of one of the following surfactants:

Triton B-1958

No Foam B

Stepanol WA Paste (Not For Use in California)

Begin spraying soon after the first leaves expand or the first symptoms of powdery mildew appear. Use the higher rates if powdery mildew is already present. Apply every seven to ten days, or as needed.

Warranty Disclaimer

DowElanco warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. DOWELANCO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by Buyer.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at DowElanco's election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

DowElanco shall not be liable for losses or damages resulting from handling or use of this product unless DowElanco is promptly notified of such loss or damage in writing. In no case shall DowElanco be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of DowElanco or the seller is

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authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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