

62719-346

4-22-2003

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APR 22 2003

John R. French, Ph.D.
Sipcam Agro USA, Inc.
300 Colonial Center Parkway, Suite 230
Roswell, GA 30076

SUBJECT: Co Pack Label
Echo 720
EPA Reg. No. 60063-7
Propimax EC
EPA Reg. No. 62719-346
Your Submission Dated January 17, 2003

Dear Dr. French:

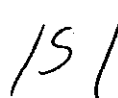
The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the following corrections:

1. In the Agricultural Use Requirements box, Special Eye Irritation Provisions section, change the 6 day REI entry to 6 ½ days.
2. On page 6, first sentence under Mixing Instructions, change the word "time" to "times".
3. The product packing must clearly indicate which component is in each chamber in case the package is punctured.

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Submit one (1) copy of the revised labeling incorporating the changes listed above. A stamped copy of your label is enclosed.

Sincerely,



Dennis M. McNeilly
Acting Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Enclosure

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EchoPropiMax Turf Fungicide Co-Pack

ECHO® 720
 EPA Reg. No. 60063-7

Active Ingredient: Chlorothalonil
 (tetrachloroisophthalonitrile) 54.0%

Other Ingredients: 46.0%

Total: 100.0%

Contains 6.0 Pounds Chlorothalonil Per Gallon

Net Contents: 130.7 fl.oz. U.S. Standard Measure

ECHO is a registered trademark of Sipcam Agro USA, Inc.

PropiMax* EC
 EPA Reg. No. 62719-346

Active Ingredient: Propiconazole
 (1-[[2-(2,4-dichlorophenyl)-4-propyl-1,3-dioxolan-2-yl]methyl]-1H-1,2,4-triazole) 41.8%

Inert Ingredients 58.2%

Total 100.0%

Contains petroleum distillates.

Net Contents 23.5 fl.oz. U.S. Standard Measure

*Propimax is a trademark of Dow AgroSciences

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.)

FIRST AID	
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING	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.
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 SWALLOWED:	Call a poison control center or doctor immediately for treatment advice. Have affected person sip a glass of water if able to swallow. Do not induce vomiting unless told by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Emergency phone numbers	(800) 424-9300 CHEMTREC (transportation and spills) (800) 900-4044 Poison Control Center (human health) (800) 345-4735 ASPCA (animal health)
NOTES TO PHYSICIAN: For the Echo 720 (chlorothalonil) portion of this product- Probable mucosal damage may contraindicate the use of gastric lavage. Persons having a temporary allergic reaction respond to treatment with antihistamines or steroid creams and/or systemic steroids. For the PropiMax EC (propiconazole) portion of this product- There is no specific antidote for this product. Induce emesis or lavage stomach, taking care to avoid aspiration of stomach contents into lungs. Give a saline laxative and supportive therapy. This product may pose an aspiration pneumonia hazard. Contains petroleum distillate.	

EPA Est. No. _____

Manufactured for
 Sipcam Agro USA, Inc.
 300 Colonial Center Parkway, Suite 230
 Roswell, Georgia 30076

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Echo 720 Precautionary Statements

Hazards to Humans and Domestic Animals

May be fatal if inhaled. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Do not breathe spray mist.

PropiMax EC Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Substantial But Temporary Eye Injury. Harmful If Swallowed, Inhaled, Or Absorbed Through Skin. Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions In Some Individuals

Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing spray mist.

EchoPropiMax Turf Fungicide Co-Pack Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to these products are listed below. If you want more options, follow the instructions for Category G on the 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 or viton
- Shoes plus socks
- Protective eyewear
- A NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

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.

Engineering Control Statements

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 160.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- 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.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 22 2003**

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

62719-346
60669-7

EchoPropiMax Turf Fungicide Co-Pack Environmental Hazards

These products are toxic to aquatic invertebrates, fish and wildlife. DO NOT apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. DO NOT contaminate water when disposing of equipment washwater or rinsate.

Chlorothalonil can contaminate surface water through spray drift. DO NOT apply when weather conditions favor drift from treated areas. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, 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 surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

Chlorothalonil degradates are known to leach through soil into ground water under certain conditions as a result of label use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

EchoPropiMax Turf Fungicide Co-Pack Physical or Chemical Hazards

Do not use, pour, spill or store near heat or open flame.

EchoPropiMax Turf Fungicide Co-Pack 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, or pets, either directly or through drift. Only protected handlers may be in the area during applications. For any requirements specific to your State or Tribe, consult the Agency responsible for pesticide regulation.

EchoPropiMax Turf Fungicide Co-pack Agricultural Use Requirements

Use these products 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.

This co-pack includes two separate products which are designed to be used and applied together to the intended site. Agricultural use requirements subject to the Worker Protection Standard are hereby stated in accordance with the most protective of the two product labels:

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
- Chemical-resistant gloves, such as barrier laminate or viton
- Shoes plus socks
- Protective eyewear

Special Eye Irritation Provisions: The Echo 720 component of this co-pack product is a severe eye irritant. Although the REI for the co-pack product expires after 24 hours, for the next 6 days entry is permitted only when the following safety measures are provided:

At least one container designed specifically for flushing eyes must be available in operating condition at the WPS-required decontamination site intended for workers entering the treated area.

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Workers must be informed, in a manner they can understand:

- that residues in the treated area may be highly irritating to their eyes;
- that they should take precautions, such as refraining from rubbing their eyes, to keep the residues out of their eyes;
- that if they do get residues in their eyes, they should immediately flush their eyes using the eyeflush container that is located at the decontamination site or using other readily available clean water; and
- how to operate the eyeflush container.

EchoPropiMax Turf Fungicide Co-Pack General Information

Use EchoPropiMax Fungicide Co-Pack only for the control of certain diseases in turfgrass as specified on this label.

Failure to follow directions and precautions on this label may result in crop injury, poor disease control, or illegal residues.

This product must not be applied within 150 feet (for aerial and air-blast applications), or 25 feet (for ground applications) from marine/estuarine water bodies unless there is an untreated buffer area of that width between the area to be treated and the water body.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions. The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

Application Information for Drift Reduction

DROPLET SIZE

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential but will not prevent drift if applications are made improperly, or under unfavorable conditions (see Wind, Temperature).

- **Volume-** Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure-** Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- **Number of nozzles-** Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle orientation-** Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle type-** Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift potential.

APPLICATION HEIGHT

Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

SWATH ADJUSTMENT

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, small drops, etc.).

WIND

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Aerial Application:

BOOM LENGTH

1. The distance of the outer most nozzles on the boom must not exceed $\frac{3}{4}$ the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

For those crops where aerial applications are indicated, apply in a **minimum of 5 gallons of water per acre**, unless specified otherwise. Avoid application under conditions when uniform coverage cannot be obtained or when excessive spray drift may occur. Do not apply directly to humans or animals.

Ground Application: Apply by ground equipment in a **minimum of 15 gals of water per acre**.

Chemigation: Do not apply this product through any type of irrigation system.

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EchoPropiMax Turf Fungicide Co-Pack Mixing Instructions

Note: Slowly invert container several times to assure uniform mixture.

Thoroughly clean spray equipment before using this product. Prepare no more spray mixture than is required for the immediate operation. Add 1/2 to 2/3 of the required amount of water to the spray or mixing tank, and begin agitation. Pour the entire contents both chambers of this container into the tank at the same time, maintaining constant agitation, to form a suspension in water. Slowly add the remaining required amount of water to the tank. Continue agitating the spray suspension before and during application.

Rinse spray tank thoroughly with clean water after each day's use and dispose of pesticide rinsate by application to a previously treated area of the same crop.

If using in a tank mixture of this product with other materials or pesticides registered for turfgrass, observe all directions for use, use rates, dilution ratios, precautions, and limitations required by the label of the tank mix product. No label dosage rate should be exceeded, and the most restrictive label precautions and limitations should be followed. This product should not be tank mixed with any product that prohibits such mixing.

EchoPropiMax Fungicide Co-Pack Directions For Use on Turfgrass

Use of this product on home lawns is prohibited. Sodfarm turf treated with chlorothalonil prior to harvest must be mechanically cut, rolled and harvested. Do not apply more than the following totals of chlorothalonil active ingredient from all registered product sources to the indicated types of turfgrass:

TYPE OF TURFGRASS	TOTAL CHLOROTHALONIL ACTIVE INGREDIENT PER ACRE PER YEAR
Golf Course Greens	73 lbs
Golf Course Tees	52 lbs
Golf Course Fairways	26 lbs
Sod Farms	26 lbs
Other Turf	26 lbs

Apply the entire contents of this co-pack container together to 65,340 square feet (1.5 acres) of growing turfgrass for control of the following diseases:

DISEASES CONTROLLED AND MAXIMUM INTERVAL OF CONTROL*	ECHO 720 APPLICATION RATE	PROPIMAX APPLICATION RATE
Dollar spot (<i>Sclerotinia homeocarpa</i> ; <i>Lanzia</i> or <i>Moellerodiscus</i> spp.) - 21 days		
Brown patch, Yellow patch (<i>Rhizoctonia solani</i> , <i>R. zeae</i> , <i>R. cerealis</i>) - 14 days		
Leaf spot, Melting-out, Brown blight (<i>Drechslera</i> spp., including <i>D. poae</i> , <i>D. siccans</i> ; <i>Bipolaris sorokiniana</i> , <i>Curvularia</i> spp.) - 14 days	2 fl. oz. / 1,000 sq.ft. 5.5 pints per acre (4.1 lbs a.i./acre)	0.36 fl. oz. / 1,000 sq.ft. 1 pint per acre (0.45 lbs a.i./acre)
Gray leaf spot (<i>Pyricularia grisea</i> , <i>P. oryzae</i>) - 14 days		
Anthracnose (<i>Colletotrichum graminearum</i>) - 14 days		

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Apply the entire contents of this co-pack container together to 32,670 square feet (0.75 acres) of growing turfgrass for control of the following diseases:

DISEASES CONTROLLED AND MAXIMUM INTERVAL OF CONTROL*	ECHO 720 APPLICATION RATE	PROPIMAX APPLICATION RATE
Summer patch (<i>Magnaporthe poae</i>) - 14 days		
Red thread (<i>Laetisaria fuciformis</i>)		
Pink patch (<i>Limonomyces roseipellis</i>) 14 - 21 days	4 fl. oz. / 1,000 sq.ft. 11 pints per acre (8.2 lbs a.i./acre)	0.72 fl. oz. / 1,000 sq.ft.
Powdery mildew (<i>Erysiphe graminis</i>)		2 pints per acre
Rust (<i>Puccinia graminis</i>) 14 - 28 days		(0.9 lbs a.i./acre)
Anthracnose (<i>Colletotrichum graminearum</i>) - 28 days		

Apply when turf is actively growing and conditions remain favorable for the above listed diseases to occur. Duration of control for listed diseases cannot be expected longer than indicated in the above table. If conditions remain favorable for disease, re-apply this product at the intervals indicated in the above tables, or alternate applications of this product with other registered disease control agents at appropriate intervals to maintain proper turfgrass health.

*Note: Some strains of target pests that cause the listed turfgrass diseases may exhibit reduced sensitivity or resistance to sterol-demethylation inhibiting fungicides, therefore such strains may not be controlled adequately through the use of this product. If sterol-DMI resistant strains of the target pests are known to occur where this product is to be applied, use either alternative disease control agents or techniques that are known to be effective for the mitigation of resistant strains of the target pests.

Storage and Disposal

DO NOT contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in a cool place. Protect from excessive heat.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, pesticide spray or 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: DO NOT reuse empty container. Triple rinse (or equivalent) and offer for recycling or 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.

WARRANTY AND LIMITATION OF DAMAGES

CONDITIONS OF SALE: Sipcam Agro USA, Inc. 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 accordance with the directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Sipcam Agro USA, Inc.. **SIPCAM AGRO USA, INC. DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SIPCAM AGRO USA, INC. SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL, OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, AND SIPCAM AGRO USA, INC.'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. BUYER AND USER ACKNOWLEDGE AND ASSUME ALL RISKS AND LIABILITY RESULTING FROM HANDLING, STORAGE AND USE OF THIS PRODUCT. SIPCAM AGRO USA, INC. DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**