

APR 21 1999

S.R. Siemer, PhD
 Siemer & Associates
 4672 W. Jennifer, Suite 103
 Fresno, CA 93722

Dear Dr. Siemer:

Subject: Labeling Amendment Adding an Alternate Brand Name and Additional Claim
 EPA Registration No. 68186-1

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

- 1) On the front panel of both the E-RASE and DETUR labels, please replace "Statement of Practical Treatment" with "Statement of First Aid."

- 2) For the DETUR label, in the third line of the third paragraph under Directions for Use, a preferred phrase would be "gallons of total spray per acre." Addition of the words "per acre" will clarify the meaning.

- 3) In the E-RASE label, under Directions for Use in the paragraph that begins **Grapes**, use as the final sentence: "To avoid foliar injury, do not continue to make applications if chlorotic, and/or brown leaf margins, or other injury symptoms occur."

Submit five (5) copies of each final printed labeling prior to releasing the product for shipment.

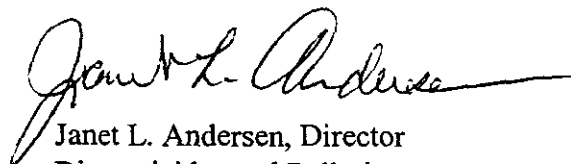
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA § 6(e). Your release for shipment of the amended products constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

CONCURRENCES							
SYMBOL	7511C	7511C					
SURNAME	Mandula	[Signature]					
DATE	4/20/99	[Signature]					

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If you have any questions about this letter, please contact Barbara Mandula by phone (703-308-7378) or e-mail (mandula.barbara@epa.gov).

Sincerely,



Janet L. Andersen, Director
Biopesticides and Pollution
Prevention Division (7511C)

Enclosure

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

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ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 21 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
68186-F

E-RASE

PURE AND NATURAL OIL

For Powdery Mildew Control

ACTIVE INGREDIENT

Jojoba Oil	97.50%
Other Ingredients	2.50%
Total	100.00%

EPA Reg. No. 68186-1

EPA Est. No. 68186-CA-001

JOJOBA OIL is extracted from JOJOBA SEEDS

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR
STATEMENT OF PRACTICAL TREATMENT AND
ADDITIONAL PRECAUTIONARY STATEMENTS.

← First Aid

Net Contents:

One (1) U.S. Gallon

IJO PRODUCTS, INC.

Fresno, CA 93755

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FIRST AID:

If in eyes: flush eyes with plenty of water and call a physician if irritation persists. If on skin: wash with plenty of water and get medical attention. If inhaled, remove victim to fresh air. If not breathing give mouth to mouth respiration and get medical attention.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

CAUTION: Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly after handling.

PERSONAL PROTECTIVE EQUIPMENT:

Applicators and other handlers must wear long-sleeved shirts, pants, waterproof gloves, shoes and socks. Follow manufacturers instructions for cleaning and maintaining personal protective equipment. If no instructions for washables available; use soap and water. Keep personal protective equipment separate from other laundry.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where these are important resources. Do not apply directly to lakes, streams or ponds. Do not apply directly to water, or areas where surface water is present, or to intertidal areas below mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment wash water. Do not apply where runoff is likely to occur. Do not apply where weather conditions favor drift from areas treated. Apply this product only as specified on this label.

**STORAGE AND DISPOSAL
DO NOT CONTAMINATE WATER, FOOD OR
FEED BY STORAGE OR DISPOSAL:**

STORAGE: Store product in original container in a cool, (not in direct sunlight), dry, locked place out of reach of children. Do not store below 50°F.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at approved waste disposal facilities.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by State or local authorities, by burning.

AGRICULTURAL USE REQUIREMENTS:

Use this product 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, greenhouses, and handlers of agricultural pesticides. It also 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 4 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; waterproof gloves; shoes plus socks; and protective eyewear.

DIRECTIONS FOR USE**READ ENTIRE LABEL BEFORE USING****GROUND APPLICATION ONLY**

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 by drift. Only protected handlers may be in area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulations.

Grapes – For eradication and prevention of powdery mildew make the first application after powdery mildew infection is observed on new shoots. Make a full coverage spray of the growing shoots using 1-2 pints E-RASE in 40-50 gallons water per acre according to the extent of foliar growth. Make a second application when mildew infections are again observed. Increase the spray gallonage, as increased growth occurs, to 50-100 gallons of water per acre and include 1-2 pints E-RASE per acre, depending on the extent of growth and the extent of disease pressure. To avoid foliar injury, do not continue to make applications if chlorotic, and/or brown leaf margins, or other injury symptoms occur. *

If flower development is advancing close to bloom do not make a third application until after bloom has passed and when disease is again observed. Use the rate of E-RASE and spray gallonage required for the second spray application. On wine and raisin grapes, additional mildew sprays can continue when damaging mildew infections are observed. If loss of natural finish at harvest is critical as with fruit destined for fresh-market end use, application of E-RASE should not be made closer than 6-8 weeks prior to harvest and the concentration shall not exceed 1 quart E-RASE per 100 gallons water per acre. If fruit finish at harvest is not critical, E-RASE can be used to control mildew with repeated application using prescribed rates and spray volume through harvest as economic levels of mildew occur. For applications made later than 6-8 weeks preharvest, do not exceed 1 pint E-RASE in 50 to 100 gallons water per acre per application or injury may occur in the form of berry desiccation.

Shake well before using and agitate spray solution. Be sure tank mix combinations, if used, are physically compatible before using them on large areas. If they produce crop injury or do not mix well, do not use the products in combination.

NOTICE: This product conforms to its chemical description and is reasonably fit for the purpose stated on the label, when used in accordance with directions under normal conditions of use. Manufacturer is not responsible for the use of this product contrary to the label instructions, or under abnormal conditions not reasonably foreseeable to the manufacturer and/or seller and the buyer assumes the risk of any such use.

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DEFUR

PURE AND NATURAL OIL For Whitefly Control

ACTIVE INGREDIENT

Jojoba Oil	97.50%
Other Ingredients	<u>2.50%</u>
Total	100.00%

EPA Reg. No. 68186-1

EPA Est. No. 68186-CA-001

JOJOBA OIL is extracted from JOJOBA SEEDS

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR
STATEMENT OF PRACTICAL TREATMENT AND
ADDITIONAL PRECAUTIONARY STATEMENTS.

↑ FIRST AID

Net Contents:
One (1) U.S. Gallon

LJO PRODUCTS, INC.
Fresno, CA 93755

ACCEPTED
with COMMENTS
In EPA Letter Dated

APP 2 1 1999
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Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
68186-1

9 B 11

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GROUND APPLICATION ONLY

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All crops – For control of white fly use a rate of ¼% to 1% (1 quart to 1 gallon per 100 gallons water) DETUR at any time during the growing season, including the day of harvest. Thorough and uniform crop coverage is required. Repeat applications may be needed, particularly with heavy population pressure. Adults are only controlled as they become entangled in the drying deposit. Eggs are smothered by the waxy coating. Gaps in spray coverage may allow some eggs to survive, requiring subsequent application.

Spray coverage is important. Continuous agitation of the spray mixture is required to assure proper deposit of DETUR. Spray gallonage may vary according to crop size. Use ¼% to 1% v/v DETUR in 10-15 gallons of total spray with small crops, such as early lettuce. Increase spray volume as crop size and foliage density increase. One hundred (100) or more gallons per acre of spray may be required to adequately cover infested trees. Sprays should be made to wet without excessive runoff. Reapply following significant rain storms.

DETUR can be applied with most conventional spray equipment, i.e., dilute airblast, or boom-type sprays may be made. Electrostatic sprays can also be used. Do not exceed 1% DETUR concentration and do not make 1% applications closer together than seven days; stop application if chlorotic and/or brown leaf margins, or other injury symptoms occur. Too frequent applications of the high rate may injure some foliage. Lower rates, i.e. 1 to 2 quarts DETUR per acre in enough water for appropriate spray coverage as described above can be used in a sustained weekly program during periods of excessive growth dilution, i.e. when rapid growth of the crop to be protected is occurring.

If DETUR is combined in the spray tank with other pesticides the most restrictive label requirements apply.

Shake well before using and agitate spray solution. Be sure tank mix combinations, if used, are physically compatible before using them on large areas. If they produce crop injury or do not mix well, do not use the products in combination.

NOTICE: This product conforms to its chemical description and is reasonably fit for the purpose stated on the label, when used in accordance with directions under normal conditions of use. Manufacturer is not responsible for the use of this product contrary to the label instructions, or under abnormal conditions not reasonably foreseeable to the manufacturer and/or seller and the buyer assumes the risk of any such use.