

72662-3

12/28/2006

1/10



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Thursday, December 28, 2006

Mr. Jim Sullivan,
ORO Agri, Inc.
990 Trophy Club Drive
Trophy Club, Texas 76262

Subject: Submission of an amendment to add additional new agricultural crops to the label for Pre-v-am Ultra (EPA Reg. No. 72662-3) under the Federal Fungicide and Rodenticide Act as Amended.

Date of Submission: April 22, 2005

EPA Reg. No.: 72662-3

Product Name: Pre-v-am Ultra

Dear Mr. Sullivan;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Two copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Precautionary Statements:

Based on the reviews for the studies cited in the Oro Agri, Inc. for the acute toxicity studies¹, revise the Hazards to Humans and Domestic Animals language as follows:

"Hazards to Humans and Domestic Animals

Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles, face shield. Avoid breathing spray mist. Wash hands before eating, drinking, chewing gum; using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse."

Sincerely,

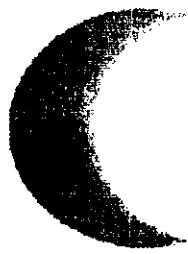
A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosures

¹ Copies of the original toxicology reviews are enclosed.

2/10



PREV-AM[®]

ULTRA

*For the Combined Control of Disease and Insect Infestations
on Agricultural Crops and Ornamentals*

ACCEPTED
with COMMENTS
In EPA Letter Dated
DEC 28 2000
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
72662-3

ACTIVE INGREDIENT:

Sodium Tetraborohydrate Decahydrate	0.99 %
OTHER INGREDIENTS	99.01 %
Total	100.00 %

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.)

See Side Panel for **FIRST AID**

2.5 US Gallons / 10 Liters

EPA Reg. No.: 72662-3

EPA Est. No.: 9367-FL-1

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. 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 and emergency assistance. It also contains specific instructions and exception pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval and notification to workers. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard. Do not enter or allow workers entry into treated areas during the ~~restricted entry~~ (RED) of 12 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 to wear protective eyewear/goggles, coveralls and waterproof gloves.

NON- AGRICULTURAL USE REQUIREMENTS: The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep unprotected persons out of treated area until sprays have dried.

Personal Protective Equipment Requirements: Applicator and other handlers must wear protective eyewear/goggles, long sleeve shirt and long pants, waterproof gloves, shoes and socks. Follow the manufacturer's instructions for cleaning/maintaining PPE. Use detergent and hot water. Keep and wash PPE separately from other laundry.

It is recommended apply with an AIR assisted type sprayer for best results. Do not apply this product through any type of irrigation system. Aerial applications are prohibited. This product is not recommended for application in mid-day sun as temporary leaf burn may occur or during periods of drought when plants are subject to heat and moisture stress.

Do not allow spray to drift from the application site and contact people, structures people occupy at any time and the associated property, parks, and recreation areas, non-target crops, aquatic and wetland areas, woodlands, pastures, rangelands, or animals. The applicator also must use all other measures necessary to control drift.

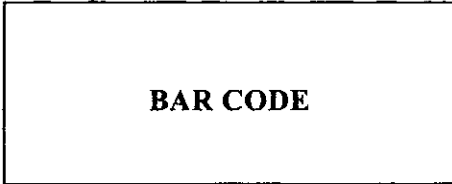
To Control Listed Disease and Insects:

Apply PREV-AM® as shown in "Directions for Application." Use sufficient water to obtain full coverage of foliage. Begin treatment just prior to or at first sign of pest or disease. If insect populations reach economic thresholds or conditions of severe disease pressure exist, the timing and frequency of applications can be as often as every 4 days until control is obtained.

Dilution and Mixing Instructions:

Add PREV-AM® to water for the following concentrations:

	PREV-AM®	Water
To Make a-	(Fl. Oz.)	(Gallons)
0.4 % Concentration	2.5	5
	10	20
	20	40
	50	100
0.8% Concentration	5	5
	20	20
	40	40
	100	100



DIRECTIONS FOR APPLICATION:

(1) Not for Use in California

(Prev-Am can also be used on crops grown for seed)

Recommended Application Rates (ground application to provide sufficient coverage of foliage):	Annuals and Row Crops:	Use 20-100 gallons per acre
	Cotton:	Use 5-50 gallons per acre
	All other crops:	Use 20-100 gallons per acre
		Use 1 to 2 gallons per 1000 square feet.

Crop:	TARGET DISEASE:	RATE: fl. oz. / 100 gallons	TARGET PEST:	RATE: fl. oz. / 100 gallons	Remarks:	
Animal, Feed, Non-Grass (1)						
<i>Alfalfa</i>			<i>Mite (1)</i> <i>Whitefly (1)</i>	50 50	<i>Spray every 7-10 days.</i>	
Berries:						
Cane berries Bush berries	Blackberry Raspberry Blueberry	Botrytis Powdery Mildew Downy Mildew	50 50 50	Aphid <i>Leaf hopper (1)</i> <i>Lygus Bug (1)</i> <i>Mealy Bug (1)</i> Mite	100 100 50 50 50	Spray every 7-10 days.
Coffee, Cacao: (1)						
			<i>Mealy bug (1)</i>	50	Spray every 7-10 days.	
Fruit:						
Pome Stone	Apple Apricot Cherry Peach Plum Nectarine	Powdery Mildew	50	Mite	50	Maximum Gal/acre to be applied according to Tree Row Volume every 7-10 days: Maximum Gal./acre = Tree height (ft.) X Tree width (ft.) X 30.54/ (divided by) Distance between rows(ft.)
<i>Citrus (1)</i>	Orange Lemon Grapefruit	<i>Greasy Spot (1)</i>	50	<i>Mite (1)</i> <i>Thrips (1)</i>	50 100	Maximum Gal/acre to be applied according to Tree Row Volume every 7-10 days: Maximum Gal./acre = Tree height (ft.) X Tree width (ft.) X 30.54/ (divided by) Distance between rows(ft.)

Crop:		TARGET DISEASE:	RATE: fl. oz. / 100 gallons	TARGET PEST:	RATE: fl. oz. / 100 gallons	Remarks:
<i>Tropical (1)</i>	Pineapple	<i>Downy Mildew (1)</i>	50	<i>Aphid (1)</i>	100	Maximum Gal/acre to be applied according to Tree Row Volume every 7-10 days: Maximum Gal/acre = Tree height (ft.) X Tree width (ft.) X 30.54/ (divided by)Distance between rows(ft.)
	Avocado	<i>Powdery Mildew (1)</i>	50	<i>Whitefly (1)</i>	50	
	Mango	<i>Botrytis (1)</i>	50	<i>Mite (1)</i>	50	
	Banana			<i>Thrips (1)</i>	100	
	Guava					
	Papaya					
	Awa (kava)					
Grapes: (1)						
	Raisin	<i>Bunch rot (1)</i>	50	<i>Mealy Bug (1)</i>	50	Do not use on vineyards after treating with sulfur in the same growing season. Spray every 10-14 days.
	Wine	<i>Powdery Mildew (1)</i>	50	<i>Mite (1)</i>	50	
		<i>Downy Mildew (1)</i>	50			
Herbs (1):						
	Watercress	<i>Downy Mildew (1)</i>	50	<i>Aphid (1)</i>	100	Spray every 7-10 days.
	Basil	<i>Powdery Mildew (1)</i>	50	<i>Beet Armyworm (1)</i>	50	
	Oregano			<i>Cabbage Looper (1)</i>	50	
	Parsley			<i>Whitefly (1)</i>	50	
	Nasturtium					
	Rosemary					
Hops:						
		Powdery mildew	50	Mite	50	Do not use on plants after treating with sulfur in the same growing season. Spray every 10-14 days.
Nuts:						
Tree	Almond Pecan Pistachio Walnut			Mite	50	Maximum Gal/acre to be applied according to Tree Row Volume every 7-10 days: Maximum Gal/acre = Tree height (ft.) X Tree width (ft.) X 30.54/ (divided by)Distance between rows(ft.)
Peanut:						
		Brown Rust (1)	50	Aphid	100	Spray every 7-10 days.
		Downy Mildew	50	<i>Beet Armyworm (1)</i>	50	
		Powdery Mildew	50	Mite	50	
				<i>Lygus Bug (1)</i>	50	
				<i>Thrips (1)</i>	100	
				<i>Whitefly (1)</i>	50	

7/10

Crop:		TARGET DISEASE:	RATE: fl. oz. / 100 gallons	TARGET PEST:	RATE: fl. oz. / 100 gallons	Remarks:
Strawberry:						
		Botrytis	50	Aphid	100	Spray every 7-10 days.
		Powdery Mildew	50	Leaf Hopper (1)	100	
		Downy Mildew	50	Lygus Bug (1)	50	
				Mealy Bug (1)	50	
				Mite	50	
				Whitefly (1)	50	
Tobacco:						
				Mite	50	Spray every 7-10 days.
Vegetables:						
Brassica Leafy	Broccoli	Downy Mildew	50	Aphid	100	Spray every 7-10 days.
	Cauliflower	Powdery Mildew	50	Beet Armyworm (1)	50	
Cabbage				Cabbage Looper (1)	50	
				Diamondback moth (1)	50	
				Imported Cabbageworm (1)	50	
				Whitefly (1)	50	
Bulb	Garlic	Botrytis	50	Thrips	100	Spray every 7-10 days.
	Onions	Downy Mildew	50			
		Late Blight	50			
		Powdery Mildew	50			
Corn (1)	Silage			Mite (1)	50	Spray every 7-10 days.
	Field					
	Sweet					
	Popcorn					
Cucurbits	Cucumber	Downy Mildew	50	Aphid	100	Spray every 7-10 days.
	Melon (Not for use on Cantaloupe in CA)	Powdery Mildew	50	Leafhopper (1)	50	
	Pumpkin			Mite	50	
	Squash			Thrips	100	
				Whitefly (1)	50	
Fruiting	Egg Plant	Downy Mildew	50	Aphid	100	Spray every 7-10 days.
	Pepper	Late Blight	50	Beet Armyworm (1)	50	
Tomato	Powdery Mildew	50	Cabbage Looper (1)	50		
				Mite	50	
				Whitefly (1)	50	
Leafy (except Brassica)	Celery	Downy Mildew	50	Aphid	100	Spray every 7-10 days.
	Head Lettuce	Powdery Mildew	50	Beet Armyworm (1)	50	
	Leaf Lettuce			Cabbage Looper (1)	50	
	Spinach			Whitefly (1)	50	
Legume	Beans	Downy Mildew	50	Aphid	100	Spray every 7-10 days.
	Chickpea	Powdery Mildew	50	Beet Armyworm (1)	50	
Lentil	Common, Lima, Snap	Brown Rust (1)	50	Mite	50	
Pea				Lygus Bug (1)	50	
	Edible, Garden, Southern			Thrips	100	
				Whitefly (1)	50	
Root & Tuber	Carrot	Powdery Mildew	50	Aphid	100	Spray every 7-10 days.
	Potato	Late Blight	50	Beet Armyworm (1)	50	
Sugar Beet				Cabbage Looper (1)	50	
				Leaf Hopper (1)	100	
Soybean (1)		Powdery Mildew (1)	50	Aphid (1)	100	Spray every 7-10 days.
		Rust (1)	50	Mite (1)	50	
OTHER CROPS:						
Fiber Crops:						

8/10

Crop:		TARGET DISEASE:	RATE: fl. oz. / 100 gallons	TARGET PEST:	RATE: fl. oz. / 100 gallons	Remarks:
Cotton				Mite Thrips Whitefly (1)	50 100 50	Spray every 7-10 days.
Grass, Forage, Fodder & Hay: (1)						
	Bentgrass Bermuda Kentucky Varieties St. Augustine Zoysia Fescue Rye Seashore Paspalum	Anthracnose (1) Dollar Spot (1) Fairy Ring (1)	50 50 50	Armyworm (1)	50	Spray every 7-10 days.
	Bentgrass Bermuda Kentucky Varieties St. Augustine Zoysia Fescue Rye Seashore Paspalum	Anthracnose (1) Dollar Spot (1) Fairy Ring (1)	1 fl. oz./1000 sq. ft.	Armyworm (1)	1 fl. oz./1000 sq. ft.	Spray every 7-10 days.
Ornamental:						
Outdoor, Nursery, and Greenhouse Plants	Allamanda, Asp. Sperengi, Blue Daze, Caladium, Carnation, Croton, Daisy, Heather, Foxtail, Fern, Ficus, Fuchsia, Gardenia, Hibiscus, Jasmine, Lily, Mandevilla, Oleander, Ornamental Citrus, Plumbago, Philadendron, Schefflera, Snowbush	Downy Mildew Powdery Mildew	50 50	Aphid Mealy Bug (1) Mite Scale (1) Whitefly (1)	100 50 50 50 50	Spray every 7-10 days.
Roses (1)		Downy Mildew (1) Powdery Mildew (1)	30 30			Spray every 7-10 days.

Tank Mixing Instructions:

PREV-AM® may be mixed with:

Applaud® (buprofezin), Bravo® (chlorothalonil), Dithane® M-45 (mancozeb), Folpan® (folpet), Folicur® (tebuconazole), Karate® (lambda-cyhalothrin), Rubingon® (fenarimol), Ridomil Gold® MZ (mancozeb/metalazxyl-M), Rimon® (nuvaluron), Spintor® (spinosad), Abamectin, Flint® (trifloxystrobin), Quadris® (azoxystrobin), Cypermethrin. **Observe the most restrictive of the labeling limitations and precautions of all products used in mixtures.**

No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Agitate container before mixing. Continuous agitation is recommended during application. Add PREV-AM® to the tank last. DO NOT mix with chemicals containing Sulfur or Oils. When mixing products containing Plant Hormones, it is recommended to test a small area prior to full-scale application to avoid potential damage to crop(s).

9/10

NOTICE: Tank mixing or use of this product with any other product, which is not specifically and expressly authorized by the label, shall be the exclusive risk of the user, applicator and/or application advisor. Read and follow the entire label of each product to be used in the tank mix with this product.

PREV-AM® contains surfactants. PREV-AM® should not be added to tanks, spray lines, or containers which may contain Copper or additional adjuvants. Pre-rinse all tanks, spray lines or containers thoroughly before adding PREV-AM®. Do not add adjuvants to PREV-AM®. Read all product labels and test for compatibility prior to mixing and application with other chemicals. Check with the manufacturers or contact your local State Extension Service if you have questions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL, DIRECTIONS, WARNINGS, OR CAUTIONS.

Bravo®, Karate®, Ridomil Gold® MZ, and Quadris® are trademarks of Syngenta. Flint® and Folicur® are trademarks of Bayer. Dithane® M-45 and Spintor® are trademarks of Dow Agrosciences. Applaud® and Rubingan® are trademarks of Nichino America, Inc. Folpan® and Rimon® are trademarks of Makhteshim Chemical Works, LTD.

Patent Numbers:
US 6,258,369 B1, US 6,277,389 B1

International Patents:
Pending

10/10

PRECAUTIONARY STATEMENTS Hazard to Humans and Domestic Animals

WARNING / AVISO Causes eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Do not get in eyes or on clothing. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Wear protective eyewear/goggles. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Environmental Hazards - Do not apply directly to water or to areas where surface water is present or to inter-tidal areas below mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash waters.

User Safety Recommendations: Wear protective eyewear/goggles, long-sleeved shirt, long pants, shoes, socks and waterproof gloves when applying this product. Wear a hat and eye protection when making overhead applications. Remove clothing immediately if pesticide soaks clothing. Change clothing as soon as possible after use. Wash the outside of gloves before removing. As with any pesticide product, wash hands thoroughly immediately after handling and before eating, smoking or using the toilet. Do not allow children or pets to contact treated area until sprays have dried.

First Aid:

If in eyes	<ul style="list-style-type: none"> *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 Inhaled	<ul style="list-style-type: none"> *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 treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> *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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

STORAGE AND DISPOSAL:

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

Storage: Store out of reach of children. Keep container closed when not in use.

Disposal: Wastes resulting from the use of this product may be disposed of on site at an approved waste disposal facility. Rinse container thoroughly then offer for recycling or reconditioning or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.