



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Michael Kellogg

Agent

Etigra

c/o Pyxis Regulatory Consulting, Inc.

4110 136th Street NW

Gig Harbor, WA 98332

RE: Notification of a Minor Label Revision and to Facilitate Registration in the State of

South Dakota

EPA Registration Number: 79676-55

Date of Submission: August 9, 2007

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated August 9, 2007, for the product Etigra – T- Methyl E-AG 70 WSB Fungicide. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P)

AUG 29 2007

Office of Pesticide Programs

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	United States  Ital Protection Age ashington, DC 20460		Registration Amendme Other	
	Application for I	Pesticide - Section	on I	
1. Company/Product Number 79676-55		2. EPA Product Manag M. Waller	er	3. Proposed Classification
4. Company/Product (Name) Etigra / T-Methyl E-AG 70 WSB Fungio	cide	PM# 21		
5. Name and Address of Applicant (Include ZIF Etigra c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Giq Harbor, WA 98332  Check if this is a new address		i e	similar or identica	e with FIFRA Section 3(c)(3) I in composition and labeling
	Sac	tion - II		
Amendment - Explain below.  Resubmission in response to Agency le  Notification - Explain below.  Explanation: Use additional page(s) if neces  Notification of a minor label revision per PRN 98 provisions of PR Notice 98-10 and EPA regulation formula of this product. I understand that it is a notification is not consistent with the terms of PR enforcement action and penalties under sections	esary. (For section I and Se -10 to facilitate product regist ons at 40 CFR 152.46, and no violation of 18 U.S.C. Sec. 10 8 Notice 98-10 and 40 CFR 15	Agency letter "Me Too" App Other - Explain ction II.) ration in the State of South to other changes have been of to willfully make any fa	n below.  n Dakota: This notificen made to the labeling lise statement to EPA	AUG 2 9 2007  cation is consistent with the g or the confidential statement of a l further understand that if this
	Sect	ion - III		
1. Material This Product Will Be Packaged In:  Child-Resistant Packaging  Yes  No  * Certification must be submitted  Unit Packaging  Unit Packaging  Unit Packaging  Unit Packaging	No. per If "Yes	ge wgt container	P G P	fetal lastic llass aper tther (Specify)
3. Location of Net Contents Information  Label Container  6. Manner in Which Label is Affixed to Product	4. Size(s) Retail Contai	Other	On Label On Label	Orrections ompanying product
	<del></del>	ion - IV		
1. Contact Point (Complete items directly below			necessary, to proce	ss this application.)

Title

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or

Agent

3. Title Agent

5. Date

11.

4. Typed Name

Michael Kellogg

2. Signature

Michael Kellogg

both under applicable law.

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow'- Applicant Copy

Telephone No. (Include Area Code)

6. Date Application

(Stamped)

Received

253-853-7369

T-Methyl E-AG 70 WSB Fungicide contains thiophanate-methyl, the active ingredient used in Topsin® M WSB.

3/08

## T-Methyl E-AG 70 WSB Fungicide

NOTIFICATION

### Fungicide in Water Soluble Bags

AUG 29 2007

**ACTIVE INGREDIENT:** 

## KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
If swallowed:	<ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes:	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing:	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled:	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
	HOT LINE NUMBER
	uct container or label with you when calling a poison control center or doctor, or going for may also contact 1-800-424-9300 for emergency medical treatment information.

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed, absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

EPA Reg. No. 79676-55

**EPA Est. No.** 

Manufactured for: Etigra™
501 Cascade Pointe Lane
Suite 103
Cary, NC 27513
www.etigra.com

**Net Weight:** 

<sup>\*</sup>Also known as dimethyl 4,4'-o-phenylenebis(3-thioallophanate)

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are barrier laminate, butyl rubber  $\geq$  14 mils, nitrile rubber  $\geq$  14 mils, neoprene rubber  $\geq$  14 mils, polyvinyl chloride (PVC)  $\geq$  14 mils or viton  $\geq$  14 mils. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

#### Mixers, Loaders, Applicators and Other Handlers supporting Dip Treatment must wear:

- Coveralls over long-sleeved shirt and long pants,
- · Chemical-resistant gloves,
- Chemical-resistant footwear plus socks,
- Chemical-resistant apron

#### All Other Mixers, Loaders, Applicators and Handlers must wear:

- · Long-sleeved shirt and long pants;
- Shoes plus socks
- Chemical-resistant gloves for all mixers and loaders and for applicators using hand held equipment.

See engineering controls for additional requirements.

#### **User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

#### **Engineering Controls**

Water-soluble packets when used correctly qualify as a closed mixing/loading system under the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(4)]. Mixers and loaders using water-soluble packets must:

- Wear the personal protective equipment required above for mixers/loaders, and
- Be provided and must have immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown coveralls, and chemical-resistant footwear.

When handlers use enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(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 clothing/PPE 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.

#### **ENVIRONMENTAL HAZARDS**

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash water.

#### **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 of 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.

Do not apply when wind speed favors drift beyond the area intended for treatment.

#### 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 exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box 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 following restricted-entry intervals (REI):

Almonds and pecans: 3 days

Apples, cherries, peaches, nectarines, apricots, and plums/prunes: 2 days Strawberries, wheat, cucurbits, soybeans, and green beans: 24 hours For all other uses on this label, the REI is 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:

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposures

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

#### **GENERAL INFORMATION**

T-Methyl E-AG 70 WSB Fungicide may be applied by ground or aerial application equipment. Normal fungicide usage indicates this product will be applied over the top of the intended crop, it is critical to ensure that the tank and spray equipment has been cleaned of all other pesticides prior to mixing this product. As with all agricultural chemicals, continuous agitation is required to keep the ingredients in suspension. Recommended application gallonage and directions are given for each crop.

T-Methyl E-AG 70 WSB Fungicide may be tank mixed with other fungicides, insecticides and plant growth regulators that have been approved for use by the EPA on the intended crop. Etigra does not make any claims of compatibility with other pesticides; always perform a Mixing Jar Test prior to tank mixing. See Compatibility test section of this label. Tank mixes of this product with highly alkaline pesticides like Bordeaux or lime sulfur is not recommended.

Most effective disease control is obtained by preventive spray timing as climatic conditions indicate fungal infection or growth is imminent. Always use the higher rates under conditions of severe disease pressure.

High volume dilute applications: Applicator should use the product per acre rate for concentrate spray applications for tree crops (example: no more than 400 gallons on apples). Use the product per 100-gallon rate for dilute ground applications. This product may be used on fruit-bearing trees and may also be used on non-bearing apples, cherries, peaches, and pecans, when needed for control of labeled leaf diseases during non-bearing years of new plantings or nursery stock. Follow all crop specific language on this label for application. Dilute sprays must not be applied in a manner that exceeds the application rate as specified in the crop Specific Application Instructions table below.

Aerial applications to tree crops: Use a minimum of 10 gal/acre for aerial application to fruit tree crops. Increased fungicidal activity is related to coverage and timing, increased volumes are required as crop canopy density increases. Note: Conifer applications require higher spray volumes, use lower volumes with mist type applicators and highest volumes with conventional types.

Row, Field and Vine Crop Applications: Use a minimum of 5 gal/acre for ground application, however most ground applications should be made with 10 to 20 gal/acre as cropping situations dictate. Increased

fungicidal activity is related to coverage and timing, increased volumes are required as crop canopy density increases.

**Plantback Restriction**: Do not plant any crop not labeled for T-Methyl E-AG 70 WSB Fungicide use within 30 days of the last application.

Chemigation: See specific directions in this label.

**Mode of Action**: T-Methyl E-AG 70 WSB Fungicide is a tubulin inhibitor fungicide falling into the FRAC Group 1 for Benzimidazole. Its Mode of Action is the inhibition of microtubule assembly. It has protectant, systemic and curative actions, each of these specific to certain crops, fungi and climatic conditions.

**Fungicide Resistance**: Fungal pathogens have proven to develop a resistance to certain fungicide families and modes of action. These are called tolerant and resistant strains of fungi. Industry and university research have developed effective programs that continue to provide excellent control of these strains, however, precautions and specific steps should be taken to ensure effective fungicide program.

It is recommended that T-Methyl E-AG 70 WSB Fungicide be rotated or tank mixed with other fungicides with different modes of action chemistry. Products containing thiabendazole or carbendazim fungicide (benzimidazole fungicides) should NOT be combined as rotation or tank mix partners.

Should T-Methyl E-AG 70 WSB Fungicide be applied as directed and the treatment is considered not to be effective, you may have encountered a resistant or tolerant fungi strain. Do not apply this mode of action chemistry again during this growing season, as this may enhance the resistance at this site. Consult with your local Cooperative Extension Service, University Research or Certified Crop Consultant for more information concerning fungicides effective on the tolerant or resistant strains encountered.

#### **MIXING INSTRUCTIONS**

T-Methyl E-AG 70 WSB Fungicide is packaged in a protective outer, resealable package containing water-soluble bags. Do not allow bags (WSB) to become wet prior to adding to the tank. Do not handle WSB with wet hands or wet gloves.

Fill spray tank to half full, start agitation. See Mixing Order chart below when any other products are tank mixed with this product.

Remove the appropriate number of unopened water-soluble bags from the outer package, adding them to the tank. Reseal the outer bag immediately to protect the unopened bags from moisture. Do not add water-soluble bags near suction area of the tank as plugging may occur prior to the bags fully dissolving. The dissolve time for the bags will depend on the water temperature and degree/type of agitation. Most bags should be dissolved in 5 minutes. If planning to tankmix high pH products or fertilizers high in nitrogen or boron, wait until the T-Methyl E-AG 70 WSB Fungicide is fully dissolved before adding them to the tank.

Should other products or pesticides be tank mixed with this product, use the Mixing Order chart and add all products, then finish filling tank with water, all the while maintaining agitation. If there is any question as to the compatibility of components, always perform a jar test with proportional amounts of each product, using water from the actual use source.

Always read and follow label directions of all products. The most restrictive label language will apply. Do not mix more spray solution than you plan to apply that day.

Conversion Table Acres Treated per 1 Lb. Water Soluble Bag					
Label Use Rate Lb/Acre T-Methyl E-AG 70 WSB Acres Treated With Fungicide One Water Soluble Bag					
1⁄4 lb	4.0				
½ lb	2.0				
1 lb	1.0				

Conversion Table Acres Treated Per 2.5 lb. Water Soluble Bag				
Label Use Rate Lb/Acre T-Methyl E-AG 70 WSB Acres Treated With One Water Soluble Bag				
1⁄4 lb	10			
½ lb	5.0			
1 lb	2.5			

Conversion Table Acres Treated Per 5 lb Water Soluble Bag				
Label Use Rate Lb/Acre T-Methyl E-AG 70 WSB Acres Treated With One Water Soluble Bag Fungicide				
½ lb 20.0				
½ lb 10.0				
1 lb	5.0			

#### **Compatibility Test for Mix Components**

Before mixing components, always perform a compatibility jar test. For 20 gallons per acre spray volume use 3.3 cups (800 ml) of water. For other spray volumes, adjust rates accordingly. Only use water from the intended source at the source temperature. Add components in the sequence indicated in the Mixing Order using 2 teaspoons for each pound or 1 teaspoon for each pint of recommended label rate per acre. Always cap the jar and invert 10 cycles between component additions.

When the components have all been added to the jar, let the solution stand for 15 minutes. Evaluate the solution for uniformity and stability. The spray solution should not have free oil on the surface, nor fine particles that precipitate to the bottom, nor thick (clabbered) texture. If the spray solution is then compatible, use the compatibility agent as directed on its label. If the solution is still incompatible, do not mix the ingredients in the same tank.

#### Mixing Order

(As each product is added to the tank, be sure it is completely dispersed before adding any other product to the mix. Maintain agitation throughout mixing and application processes.)

- 1. Water. Begin by agitating a thoroughly clean sprayer tank three-quarters full of clean water.
- 2. Agitation. Maintain constant agitation throughout mixing and application.
- 3. Inductor. If an inductor is used, rinse it thoroughly after each component has been added.
- 4. **Products in PVA bags**. Place any product contained in water-soluble PVA bags into the mixing tank. Wait until all water-soluble PVA bags have fully dissolved and the product is evenly mixed in the spray tank before continuing.
- 5. **Water-dispersible products** (such as, dry flowables- DF, wettable powders- WP, wettable dry granules- WDG, suspension concentrates- SX or suspo-emulsions- SE).
- 6. Water-soluble products.
- 7. Emulsifiable concentrates (such as oil concentrate when applicable).
- 8. Water-soluble additives (such as AMS or UAN when applicable).
- 9. Remaining quantity of water.

Maintain constant agitation during application.

#### **CHEMIGATION USE INSTRUCTIONS**

California allows use by chemigation only for crops of beans, cucurbits (cucumbers, melons, pumpkins, squash), peanuts, soybeans, and strawberries.

Apply this product only through: sprinkler including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move; or drip (trickle) irrigation systems. Do not apply this product



through any other type of irrigation system. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label prescribed safety devices for public water systems are in place. Public water system means a system for the provision of piped water for human consumption if such system has at least 15 service connections or regularly serves and average of at least 25 individuals daily at least 60 days out of the year.

#### **IRRIGATION/ CHEMIGATION SYSTEM REQUIREMENTS**

Pressurized irrigation and pesticide injection system must meet the following requirements:

The system must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock and prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, back flow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the flow outlet end of the fill pipe and the top or overflow rip of the reservoir tank of at least twice the inside diameter of the fill pipe.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.

The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

#### **FUNGICIDE DILUTION MIX PREPARATION**

Chemical mix tank, induction lines, mixing and induction motors and pumps should all be cleaned of any prior use pesticide residues, scale or other foreign matter that may interfere with mixing or transfer or the pesticide dilution into the irrigation system. Flush with clean water.

Start by filling the mix tank at least ½ full. Begin agitation. Carefully add the required amount of T-Methyl E-AG 70 WSB Fungicide and then the rest of the water. Allow time to mix completely.

#### **APPLICATION INSTRUCTIONS**

Observe ALL requirements in the System Requirements section above.

In order to ensure a uniform pesticide suspension and application, be sure to continuously agitate the fungicide tank-mixture during mixing and application.

Inject a greater volume of a more dilute suspension per unit time in order to achieve greater accuracy in distribution and calibration.

Do not apply more irrigation water per acre than recommended, decreased product performance may occur from the over diluted application.

Chemigation should not be attempted when wind speed favors drift. When system connections or fittings are seen to leak, chemigation should be stopped and the component repaired prior to restart. When nozzles are not providing uniform distribution, operator should recalibrate immediately. System should always remain in good repair.

When chemigation is completed, allow sufficient flush time for pesticide to be cleared from all nozzles and lines prior to shutting off the flow of irrigation water.

#### Fertilizer co-mix Instructions:

You may mix and apply this product with other chemically-neutral liquid fertilizers. However, the applicator should be aware that mixing this product with highly alkaline fertilizers (such as aqueous ammonia) may cause problematic degradation of this product. Such a mix may prevent optimum control.

#### Sprinkler and Drip Irrigation Requirements:

Observe all requirements set forth in the "Chemigation Use Instructions", "Irrigation/Chemigation System Requirements", "Fungicide Dilution Mix Preparation" and "Application Instructions".

Always observe local irrigation restrictions or ordinances.

Overhead irrigation systems should be repaired to block the spray jets or nozzles nearest the operations control panels to not allow treated water to contact the operator or operation station.

Sprinkler system should be calibrated to deliver no more than 0.4 inches of water per acre. Larger volumes of water may reduce product efficacy. Start sprinkler water flow, then begin injection of the mixed suspension of T-Methyl E-AG 70 WSB Fungicide into the irrigation water line. Continually monitor calibration to ensure proper application rate per acre. To ensure proper mixing of the suspension of T-Methyl E-AG 70 WSB Fungicide and the irrigation water, it should be injected with a positive displacement pump into the main line just ahead of a right angle pipe turn (violent water pressure sheer).

Apply T-Methyl E-AG 70 WSB Fungicide continuously for the duration of the water application.

After overhead chemigation treatment with T-Methyl E-AG 70 WSB Fungicide has been completed, treated area should not be irrigated again for at least 24 hours to prevent washing the fungicide off the crop leaves and canopy.

A pesticide supply tank is recommended when using drip (trickle) irrigation systems. Start by filling the tank at least ½ full. Begin agitation. Carefully add the required amount of T-Methyl E-AG 70 WSB Fungicide and then the rest of the water. Allow time to mix completely. In order to ensure a uniform pesticide suspension and application, maintain agitation during mixing and application.

### **Tree Crop Specific Application Instructions**

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Almonds	Brown Rot Blossom Blight Monilinia spp.	1.0 to 1.5	0.7-1.05 Max. Al per	N/A	Per crop year, apply no more than 3 lb. of this product per acre.
	Jacket Rot Monilinia, Sclerotinia, Botrytis		year 2.1 lb.		PHI = 1 day
	Leaf Blight Seimatosporium		per acre		Applications should be initialed at pink bud and continued through petal fall.
	Scab Cladosporium spp.				Pink Bud applications can be made alone, however later applications should be tank mixed with labeled contact type, multi-site fungicides.
					See Fungicide Resistance above.
					For Almonds only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 3 days, unless they are wearing appropriate PPE for early entry.
*Not for use against this	Apple scab Venturia spp.	1.4 in California and 1.0 elsewhere	1.4 in California and 1.0	0.375 in California and 0.25 elsewhere	Per crop year, apply no more than 4 lb. of this product per acre.
disease in California	Black pox* Helminthosporium papulosum		elsewhere	1	PHI = 1 day
California	Black Rot Botryosphaeria spp.  Brooks Fruit Spot Mycosphaerella spp.		Max. Al per		Applications should be initiated at green tip and continue at 5 to 10 day intervals, continuing through petal fall.
	Flyspeck Zygophiala spp.		year 2.8 lb. per acre		Cover sprays can continue at 7 to 14 day intervals as needed.
	Powdery Mildew Podosphaera spp.				See Fungicide Resistance above.
	Sooty Blotch Gloeodes spp.  White Rot* Botryosphaena spp.				For Apples only: Do not enter or allow worker entry into treated areas during the restrictedentry interval (REI) of 2 days, unless they are wearing appropriate
					wearing appropriate PPE for early entry.

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Apricots	Brown Rot Monilinia spp.	1.0 to 1.5 pounds	0.7- 1.05	0.5	Do not apply more than 4 lb. of this product per acre per crop year.
	Brown Rot Blossom Blight Monilinia spp.  Fruit Brown Rot Monilinia spp.	(in CA use 1.5 pounds)	Max AI per year 2.8 lb. per acre		PHI = 1 day First application should be made at early bloom (red bud), followed by a second application at full bloom.
					Under severe disease pressure, additional applications should be made at 10 to 14 day intervals beginning at full bloom, through final pre-harvest sprays.
	·				If conditions develop for Fruit Brown Rot apply 1 to 2 sprays starting 21 days prior to harvest.
					See Fungicide Resistance Above.
			·		For Apricots only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 2 days, unless they are wearing appropriate PPE for early entry.
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		,			

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Cherries	Brown Rot Monilinia spp.  Brown Rot Blossom Blight Monilinia spp.	1.0 to 1.5 (In CA use 1.5 pounds)	0.7 – 1.05 Max Al per year 2.8 lb.	0.5	First application should be made at early bloom (popcorn stage), followed by a second application at full
	Fruit Brown Rot  Monilinia spp.		per acre		bloom.  Under severe disease pressure, additional applications should be made at 10 to 14 day intervals beginning at full bloom, through final pre-harvest sprays.
					If conditions develop for Fruit Brown Rot, apply 1 to 2 sprays starting 21 days prior to harvest.
	Cherry Leaf Spot Coccomyces spp.	1.125 to 1.5	0.8 – 1.05	0.375-0.5	Initiate applications as leaves begin to unfold, near petal fall or before.
			Max AI per year 2.8 lb. per acre		Continue at first, second and third cover sprays at 10 to 14 day intervals. If needed apply at 14 to 21 day post harvest.
	Powdery Mildew Podosphaera spp. and Sphaerotheca spp.	1.0 to 1.5	0.7 – 1.05	0.5	First application should be made at early bloom (popcorn stage),
		(In CA use 1.5 pounds)	Max AI per year 2.8 lb. per acre		followed by a second application at full bloom.
		PLUS	PLUS	PLUS	PLUS
		1.125 to 1.5	0.84 – 1.05	0.375 to 0.5	Also make applications of this product at shuck fall and first cover.
					See Fungicide Resistance Above
		General Information per acre.	tion: Per crop ye	ear, apply no mor	e than 4 lb. of this product
		PHI =1 day			•
			ted-entry interva		atry into treated areas unless they are wearing

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Nectarines	Brown Rot Monilinia spp.  Brown Rot Blossom Blight	1.0 to 1.5	0.7 1.05	0.5	Per crop year, apply no more than 4 lb. of this product per acre.
	Monilinia spp.  Fruit Brown Rot  Monilinia spp.	(In CA use 1.5 pounds)	Max. Al per year 2.8 lb per acre		PHI = 1 day First application should be made at early bloom (pink bud), followed by a second application at full bloom.
					Under severe disease pressure, additional applications should be made at 10 to 14 day intervals beginning at full bloom, through final pre-harvest sprays.
	·		·		See Fungicide Resistance above.
					For Nectarines only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 2 days, unless they are wearing appropriate PPE for early entry.

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Peaches	Brown Rot Monilinia spp.	1.0 to 1.5	0.7-1.05	0.5-0.75	Per crop year, apply no more than 4 lb. of this product per acre.
	Brown Rot Blossom Blight Monilinia spp.  Fruit Brown Rot Monilinia spp.	(In CA use 1.5 pounds)	Max. Al per year 2.8 lb. per acre		PHI = 1 day First application should be made at early bloom (pink bud), followed by a second application at full bloom.
	Peach Scab Cladosponum spp.	Plus for Scab 1.0 to 1.5	Plus for Scab 1.125-1.5	Plus for Scab 3/8- ½	Under severe disease pressure. Additional applications should be made at 10 to 14 day intervals beginning at full bloom, through final pre-harvest sprays.
,					When treating Peach Scab, make additional applications at Shuck Split and first cover spray.
					See Fungicide Resistance above.
					For Peaches only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 2 days, unless they are wearing appropriate PPE for early entry.
Pears .	Fabraea Leaf spot  Fly speck  Zygophiala spp.	1.0	0.7	0.25	Per crop year, apply no more than 4 lb. of this product per acre.
	Pear Scab Venturia spp.  Powdery Mildew Podosphaera spp.  Sooty Blotch Gloeodes spp.		Max Al per year 2.8 lb. per acre		PHI = 1 day  Application should be initiated at green tip, continue on a 7 to 10 day schedule through petal fall. As conditions warrant, continue applications at 7 to 10 day intervals through the cover sprays.
,					For Pears Only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 1 day, unless they are wearing appropriate PPE for early entry.

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Pecans	Brown Spot Cercospora spp.	0.5 to 1.0	0.375- 0.7	N/A	Per crop year, apply no more than 3 lb. of this product per acre.
	Downy Spot  Mycospaerella spp.		Max Al per year 2.1 lb.		PHI = 1 day
	Liver Spot Gnomonia spp.  Powdery Mildew Microsphaerella spp.		per acre		First application should be made as leaves begin to show, followed by repeat applications every three to four weeks until shuck split.
	Scab Fusicladium spp.				Following shuck split, do not make any further applications.
	Stem End Blight Botryosphaeria spp.				Use highest rates for aerial applications AR, GA, LA, MS, OK, TX.
	Zonate Leaf Spot Cristulariella spp.				See Fungicide Resistance above.
					For Pecans only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 3 days, unless they are wearing appropriate PPE for early entry.
Pistachios	Shoot Blight Botrytis spp. and Botryosphaeria spp.	1.5 to 2.0	1.05-1.4	0.5-0.625	Per crop year, apply no more than 2 lbs. of this product per acre.
			Max. Al per		Make application at bloom.
			year 1.4 lb. per acre		Ground application: apply at least 100 gallons per acre.
					Aerial application: Appl at least 20 gallons per acre and applicator should fly directly over every row of trees.
•					See Fungicide Resistance above.

Tree Crops	Pest	Pounds Product per Acre	Pounds Al per Acre	Pounds Product per 100 GAL	Instructions
Plums/ Prunes	Brown Rot Monilinia spp.  Brown Rot Blossom Blight Monilinia spp.  Fruit Brown Rot Monilinia spp.	1.0 to 1.5 (in CA use 1.5 pounds)	0.7-1.05	0.5	Application should be initiated at early bloom (green tip), followed by a second application at full bloom.  Under severe disease pressure, additional applications should be made at 10 to 14 day intervals beginning at full bloom, through final pre-harvest sprays.
	Black Knot Dibotryon spp.	1.0 to 1.5 (in CA use 1.5 pounds)	0.7-1.05	0.5	Initiate applications before bloom, then at petal fall and first 3 cover sprays at 10 to 14 days intervals.
	Leaf Spot Coccomyces spp.	1.0 to 1.5 (in CA use 1.5 pounds)	0.7-1.05 Max AI per year 2.8 lb. per acre	0.5	Initiate applications as leaves begin to unfold, near petal fall or before. Continue at first, second and third cover sprays at 10 to 14 day intervals. If needed apply at 14 to 21 days post harvest.
		per acre.	ion: Per crop y	ear, apply no more	See Fungicide Resistance above. e than 4 lb. of this product
			restricted-entry	interval (REI) of 2	er entry into treated days, unless they are

TREE CROPS CONIFER SPP.	PESTS *not for conifer use in CA	PRODUCT/ACRE and MINIMUM GALLONAGE PER APPLICATION	INSTRUCTIONS
(Pines) Austrian Pine Christmas Trees Red Pine Scots Pine	Tip Blight  Diplodia spp.	1 pound product/ acre applied in at least 100 gal/acre	First application should be made at bud break, followed by a second application shortly prior to needle emergence, usually 10-14 days after bud break. A third application may be made approximately two weeks following needle emergence.
			Coverage may improve by adding spreader/ sticker.
			Do not apply more than 3 lb. of product per year.
	ľ		Do not graze treated area.
(Fir)	Rhabdocline Needle Cast Swiss Needle Cast	1 pound product/ acre applied in at least 50 gal/acre	Do not apply more than 3.5 lb of product per year.
Douglas	Phaecryptopus spp.		First application should be made near the beginning of May, followed by applications every four (4) weeks.
			Coverage may improve by adding a spreader/sticker
			Do not graze treated area.

SEEDLING TREATMENT	PESTS	MIX RATIO	INSTRUCTIONS .
Longleaf Pine	Brown Needle Blight Scirrhia spp.	1 oz product to 9.5 ounces dry Kaolinite clay	This product should not be applied to seedling foliage.
Loblolly Pine	Fusarium spp. and	2 oz Product to 50 ounces	Prior to application, immerse
Longleaf Pine	Rhizoctonia Root Rot	Kaolinite clay, add enough water to make a slurry	the roots of the seedlings in clean water. The roots may
Slash Pine		water to make a diarry	then be treated with a mixture of Kaolinite and this product.
			While treating seedlings, DO NOT ALLOW EXCESSIVE DRYING OF ROOTS or exposure to freezing temperatures or
			temperatures greater than 90°F.
			This product is not effective in controlling <i>Phytophihora</i> spp. or <i>Pythium</i> spp.

## Row, Field, and Vine Crop Specific Application Instructions

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Beans	Gray Mold Botrytis spp.	1.0 to 2.0 pounds (one application per season)	0.7 – 1.4 lb. Al per acre  Max Al per year 2.8 lb.	Per crop year, apply no more than 4 lb. of this product per acre.
	White Mold Sclerotinia spp. Anthracnose Colletotrichum spp.		per acre	Note: The 1.0 to 2.0 lb product per acre rate is for one application per season. When making multiple applications, the maximum single application is 1.5 lb. product per acre.
				PHI (California) = 14 days succulent beans, 28 days for lima beans and dry beans.
				PHI (all other states) = 14 days for succulent and lima beans, 28 days for dry beans.
				Applications should be initiated when one open bloom is found on 10-30% of plants OR as conditions develop for disease infection. Reapply as required, after at least 7 days, as disease conditions dictate.
				As crop canopy increases and with heavier infestations of insects, use higher rates.
				For Green Beans only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 1 day, unless they are wearing appropriate PPE for early entry.

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Cucurbits	Acremonium/ Cephalosporium	0.5 pound	0.35 lb. Al per acre	Product should be
(including: Cantaloupe,			May Al may page may year	sprayed in-furrow, on
	Hypocotyl Rot		Max Al per acre per year is 2.1 lbs. from all	top of the seeds at
Casaba,				planting using at least
Cucumbers, Melons,			combinations and	10 gallons of water per
	A-4b		timings	acre.
Pumpkins, Summer	Anthracnose*		1	Scout fields as weather
Squash and	Colletotrichum spp.		,	and conditions indicate
Winter Squash	Common Storm blights	•		infection could be
and	Gummy Stem blight*  Didymella spp.			present. Start
Watermelon)	Didymena spp.	·		treatments as plants
vvalernielon)	Powdery Mildew			begin to run or when disease is found.
*Not for use	Erysiphe spp.			1
against this	Erysiphe spp.			Repeat treatments at 7-
disease in	Target Spot*		1	14 days intervals.
California	Corynespora spp.			Target Spot treatments should be made at 7-
Camorna	Curyriespora spp.			day intervals as
				needed.
	Belly Rots*			
	Rhizoctonia spp. and			Application Volume
	Fusarium spp.			should be enough to allow complete
	Fusanum spp.		· ·	
				coverage to run or drip off plant into soil.
				This product is not
				effective in controlling
	Į į		Į.	Phytophthora spp. or
				Pythium spp.
	Suppression of Vine		· ·	Applications for
	Decline Outpression			suppression of these
•	Monosporascus			diseases should be
	cannonballus			made through buried
	Gamionad			drip irrigation lines (see
	Charcoal Rot			chemigation section of
	Macrophomina spp.	·		this label) so to apply
			·	directly to the root zone.
	]		,	Start applications at
				emergence and
				continue at 14-day
		•		intervals until harvest.
	( )			Weekly or biweekly
				applications, beginning
	]			4-6 weeks prior to
				harvest will offer some
		•		suppression, but will not
			1	be as effective as a
				season-long program.
		•		See Fungicide
		· · · · · · · · · · · · · · · · · · ·	·	Resistance above.
		General Information: Per acre.	crop year, apply no more that	an 3 lb. of this product per
		·	-:4-	•
		PHI = 1 day for all Cucurt	DITS	•
				•
•		For Cucurbits only: Do no	ot enter or allow worker entry	into treated areas during
			al (REI) of 1 day, unless the	
	i l	PPE for early entry.	•	<b>→</b> • • • • • • • • • • • • • • • • • • •

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Garlic (Treatment for garlic cloves prior to planting)	Penicillium Clove Rot	Make a suspension of 1 lb. product per 100 gallons of water	N/A	Solution tank mixture should be continuously agitated to ensure proper treatment suspension ratio.
				Treatment:
				Garlic cloves should be immersed in this suspension for no less than five minutes. Remove cloves from solution and allow to drain and dry. Once dry, cloves are ready for planting.
Grapes	Botrytis Bunch Rot	1.0 to 1.5 pounds	0.7 – 1.05 lb Al per acre	Monitor disease climate
	Botrytis cinerea Powdery mildew Uncinula necator			conditions. Start treatments at first bloom, repeat at 14 days if needed. Make another
				application as sugar starts to increase, around 21-28 days prior to harvest. If disease
				conditions remain favorable, make a final application 14 days after.
				Use sulfur and/or triazole/ DMI fungicides in a rotation for Powdery Mildew in a season long approach
				for control. See Resistance Section.
	Note: East of the Rocky Mountains: Bitter Rot	0.75 to 1.5 pounds	0.525 – 1.05 lb. Al per acre	Start applications as leaves unfold, continue at 14 to 21 day
	Melanconium  Black Rot Guignardia		Max Al per year 2.8 lb per acre	intervals. Rotate fungicide modes of action in a season long program.
	Powdery Mildew Uncinula spp.	General Information: Per acre. PHI = 7 days	crop year, apply no more th	an 4 lb. of this product per
Onions* (in Furrow)  *Not for this use in California	White Rot* Sclerotinia spp.	0.7 ounce per 1000 row feet (with 12 inch row spacing) OR 32 ounces per acre broadcast	N/A	Product solution should be sprayed directly into the open planting furrow at the time of planting seed, sets or bulbs. Do not use for this use through any type of irrigation system.

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Peanuts	Early Leaf Spot Cercospora spp.	0.5 pound	0.35 lb. Al per acre	Do not apply more than 1.4 lb. of this product per acre per crop year.
	Late Leaf Spot Cercospora spp.		Max Al per year 1.4 lb. per acre from all combinations and	PHI = 14 days Scout field as conditions indicate infection could
	Leaf Spot Cercospora spp. Rust		timings.	occur. Start treatments when disease is verified or 35 days after planting. Repeat as
	Puccinia spp. Limb Rot			needed at 14 day intervals. This product should
	Rhizoctonia spp.			always be used in conjunction with another
	Web Blotch Ascochyta spp.			non-benzimidazole fungicide. See Fungicide Resistance above.
Potatoes*	White Mold Sclerotinia sp.	1.0 to 1.5 pounds	0.7-1.05 lb. Al per acre	Do not apply more than 4 lb of this product per
*Not for this use in California		,	Max AI per year 2.8 lb per acre per season	acre per crop year. PHI = 21 days Treatments are most
in Camornia				efficacious when made prior to disease development.
<i>:</i>				Start treatments just around time of row closure. Spray must
				cover all susceptible plant parts, branches, flowers and stems for
	·			adequate control. Scout and reapply at 7 to 14 day intervals or as
				conditions occur for disease development. Early/ Late Blight
				Control: You may tank- mix this product with other blight-control fungicides.
				Etigra does not recommend aerial application for control of
	:			this disease on this crop.

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Soybeans	Anthracnose Colletotrichum spp.	0.5 to 1.0 pounds	0.375 – 0.7 lb. Al per acre	First application can be made at full bloom up until the pods are
	Brown Spot Septoria spp.	Use higher rate as higher density canopy develops		between 1/8" and 1/4" in length, followed by a
	Frogeye Leaf Spot Cercospora spp.			second application 14 days thereafter. The second application must
	Pod and Stem Blight (Diaporthe spp, and the	,		be made less than 14 days following bean formation or when
	imperfect stage, Phomopsis spp.)		; *	average pod length is 1/2 or greater. When beans are under severe disease
	Purple Seed Stain			pressure, utilize the higher application rates.
	Cercospora spp.			For Seed Beans Only: A single high-rate application may be made
v.				at the time of bean formation to improve seed quality.
	White Mold Sclerotinia spp.	0.75 to 1.0 pound	0.525 – 0.7 lb. Al per acre	First application should be made at early bloom (R-1 to R-2 stage). A
				second application may be made 14 days later as
				conditions dictate. Spray must cover all susceptible plant parts, branches,
·			·	flowers and stems for adequate control.  Aerial Application: Use
·	Aerial Blight (suppression)	1.0 pound	0.7 lb. Al per acre	at least 5 gallons.  Do not make more than 2 applications per year.
	Soybean Rust		,Max Al per year 1.4 lb per acre for Soybeans	First application must be made prior to infection,
	Phakopsora pachyrhiza	•		monitor climatic conditions and sentinel plots in your area.
				Reapply 21 days later if needed. It is highly recommended
			·	that a DMI/Triazole fungicide, such as
				tebuconazole be tank mixed for Soybean Rust. First application must be
				made at R-1 with the tank mix for control. Reapply as conditions warrant.
		General Information: Per ci acre. Do not graze treated	rop year, apply no more than a area.	
		PHI= 21 days		
			enter or allow worker entry in El) of 1 day, unless they are w	



Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Strawberries	Fruit Rot Botrytis spp.	0.75 to 1.0 pound	0.525-0.7 lb. Al per acre	Per crop year, apply no more than 4 lb. of this product per acre.
	Leaf Blight  Dendrophoma spp.			PHI = 1 day
	Leaf Scorch Diplocarpon spp.	Use highest rate under severe conditions	Max Al per year 2.8 lb. per acre	Start treatments as blooming begins, repeat at 7 to 10 day intervals.
	Powdery Mildew Diplocarpon spp.	·		See Fungicide Resistance above.
				For Strawberries only: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 1 day, unless they are wearing
				appropriate PPE for early entry.

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Sugarbeets	Cercospora Leaf Spot	0.75 to 1.0 pound per	0.35 - 0.7 lb. Al per acre	First application should
	Cercospora spp.	acre per application	per application	be made prior to
				disease emergence,
*Not for this use		(in CA use 0.5 pound	Max Al per year 2.1 lb.	when environmental
in California		rate)	per acre	conditions are favorable
				for disease
				development. As
				required, a second
			:	application may be made with a NON-
	ļ ·			benzimidazole fungicide
				within 14 days.
		1	·	If tolerance or resistant
	·			strains are known to be
	·			in the area, a tank mix
				with a protectant type
	i		·	fungicide is
		•		recommended.
				Do not apply this
	, ,		,	product more than once
		·	·	per year for Cercospora
			<u>.</u>	spp.
	Powdery Mildew*	0.75 to 1.0 pound		Start treatments
	Erysiphe spp.			immediately, as disease
	·			is verified, follow with a NON-benzimidazole
				fungicide as needed or
				within 14 days after.
				Tank mixes are
				recommended for this
				disease.
				See Fungicide
				Resistance above
		General Information: Per acre.	crop year, apply no more the	an 3 lb. of this product per
	,	PHI = 21 days		
		7 111 21 days		

Crop	Pests	Pounds Product per Acre	Pounds Al per Acre	Instructions
Triticale Wheat	Eye Spot	1.0 pound	0.7 lb Al per acre	Do not make more than
(Fall Seeded in the states of	Foot Rot			one application per season.
Idaho, Oregon and Washington only)	Strawbreaker Pseudocercosporella spp.			PHI = 90 days (do not cut for 90 days after application)
*Not for use in CA				Applications should be made after tillering, but before stem elongation begins. Application can be by ground or aerial means.
				Do not graze treated areas until after harvest
				For Wheat only: Do not enter or allow worker entry into treated areas during the restrictedentry interval (REI) of 1 day, unless they are wearing appropriate PPE for early entry.

Note: Do not exceed the maximum rate of AI per acre in dilute sprays.

#### STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry, secure location in its original container only.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of 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:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

#### CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Etigra or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Etigra and Seller harmless for any claims relating to such factors.

Etigra warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of

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this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Etigra, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ETIGRA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Etigra nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ETIGRA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ETIGRA OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Etigra and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Etigra.

T-Methyl E-AG 70 WSB Fungicide is not manufactured or distributed by Cerexagri, Inc., seller of Topsin<sup>®</sup> M WSB.

Topsin<sup>®</sup> is a trademark of Nippon Soda Company, Ltd. Etigra™ is a trademark of Etigra.

#### PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516

Email: www.PyxisRC.com

August 9, 2007

#### COURIER DELIVERY

Mary Waller (PM21) Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 S. Crystal Drive Arlington, VA 22202-4501

RE: Etigra – T-Methyl E-AG 70 WSB Fungicide (EPA Reg. No. 79676-55)

> Notification of a Minor Label Revision per PRN 98-10 to Facilitate Registration in the State of South Dakota

Dear Ms. Waller.

On behalf of Etigra please find the enclosed notification of a minor label revision per PR Notice 98-10 for T-Methyl E-AG 70 WSB Fungicide (EPA Reg. No. 79676-55). At the request of the State of South Dakota, the sentence "Do not apply when wind speed favors drift beyond the area intended for treatment" has been reiterated under the Directions for Use heading (p. 2 of the enclosed labeling).

Please Note: New language is NOT being added to the label, identical language appears under the "IRRIGATION/CHEMIGATION SYSTEM REQUIREMENTS" heading (p. 6 of the enclosed labeling) however South Dakota requested this sentence also appear under the Directions for Use heading.

In support of this notification, we enclose the following:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. One (1) copy of the T-Methyl E-AG 70 WSB Fungicide labeling with changes tracked
- 3. One (1) copy of the T-Methyl E-AG 70 WSB Fungicide labeling with changes incorporated
- 4. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures



January 14, 2007

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Gro-Pro, LLC doing business as Etigra (EPA Company Number 79676), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Randall V. Canady Chief Operating Officer

cc: Pyxis Regulatory Consulting, Inc.

Bandell V. Carras

www.etigra:com