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**FEDERAL EXPRESS**

March 31, 2015

Document Processing Desk **(PETN)(REG-FEE)(E-SUB)**  
Office of Pesticide Programs **(7504P)**  
U.S. Environmental Protection Agency  
2777 South Crystal Drive  
Room S-4900, One Potomac Yard  
Arlington, VA 22202-4501

**Attention:** Ms. Hope Johnson, Product Manager Team 21

**Subject: Petition Proposing a Cyprodinil Tolerance in or on Tuberous and Corm Vegetables Subgroup 1C**

**Inspire Super® (EPA Reg. No. 100-1317)**  
**Switch® 62.5 WG (EPA Reg. No. 100-953)**  
**Vangard® WG (EPA Reg. No. 100-828)**  
**Cyprodinil Technical (EPA Reg. No. 100-811)**  
**Proposed PRIA Category R170: Additional Food Uses**  
**Proposed PRIA Category M008: Request to Grant Exclusive Use**

Dear Ms. Johnson:

Syngenta Crop Protection, LLC herein submits a petition to propose a new tolerance for cyprodinil in or on tuberous and corm vegetables subgroup 1C as a result of a proposed new use for the end-use products Inspire Super® (premix consisting of cyprodinil and difenoconazole), Switch® 62.5WG (premix consisting of cyprodinil and fludioxonil), and Vangard® WG (solo cyprodinil formulation).

Syngenta believes the existing tolerances for difenoconazole on potatoes, subgroup 1C are sufficient. Difenoconazole is currently registered with an equivalent foliar use on potatoes (Inspire, EPA Reg. No. 100-1262; MRID 47958501). Additionally, the current 4.0 ppm tolerance for difenoconazole was based on a post-harvest use (MRID 4843701) which resulted in higher residues than the foliar use on potatoes. However, Syngenta will submit an amendment requiring data review for difenoconazole to ensure proposed use patterns are acceptable.

Syngenta believes the existing tolerances for fludioxonil are sufficient in or on tuberous and corm vegetables subgroup 1C at 6.0 ppm which was also based on post-harvest data (MRID 4843701). In a separate but related action, Syngenta will submit an amendment requiring data review for fludioxonil to include the foliar use pattern for potatoes.

Enclosed with this letter Syngenta is providing the proposed draft labelling adding use directions for the new crop to the end-use products, Inspire Super® (EPA Reg. No. 100-1317), Switch® 62.5 WG (EPA Reg. No. 100-953), Vangard® WG (EPA Reg. No. 100-828) and cyprodinil technical label (EPA Reg. No. 100-811).

**e-Submission**



## Minor Use Exclusive Use Qualification

“Under FIFRA § 3 (c)(1)(F)(vi), Syngenta respectfully requests EPA that the data submitted in support of the minor use registrations contained in this application are entitled to exclusive use protection for the period of 10 years from the date of submission. The exclusive use period for the pesticide cyprodinil has expired and the data pertaining to the minor use registration is eligible under FIFRA § 3 (c)(1)(F)(vi). Specifically, Syngenta considers the following minor crops to qualify under this Section: Arracacha, Arrowroot, Artichoke (Chinese and Jerusalem), Canna, Cassava (bitter and sweet), Chayote (root), Chufa, Dasheen (Taro), Ginger, Leren, Sweet Potato, Tanier, Turmeric, and Yam (bean and true).

Under the provisions of FIFRA § 3 (c)(1)(F)(vi), Syngenta states, to the best of our knowledge that the exclusive use period for cyprodinil has expired. The original registration of cyprodinil was April 10, 1998, which is more than 10 years ago.”

The following representative data pertaining solely to the above minor use is eligible for the provisions of this paragraph:

Cyprodinil - Cyprodinil EW (A16001A) and Cyprodinil WG (A9219B) – Magnitude of the Residues in or on Potato, USA 2013, Final Report (MRID 49557301)

## Fees for Services

In compliance with the Pesticide Registration Improvement Act III, Syngenta will pay the required pesticide registration fees for this action. Syngenta believes that this submission fits the following registration fee categories: R170 (additional new food use); and M008 (request to grant exclusive use of data) with the applicable fees of \$62,975.00 and \$1,575.00, respectively.

Enclosed are the following documents to support the application which is being filed as an electronic submission:

- Cover letter
- Transmittal Document
- Two (2) PRIA Prepayment Receipts (Check # 34340424: \$62,975.00 and Pay.gov Tracking ID: 25KHB9GN: \$1,575.00)
- Tolerance Petition for the active ingredient cyprodinil
- Notice of Filing for cyprodinil
- One (1) Residue Chemistry Data Volume: TK0147591: MRID 49557301
- Four (4) EPA Form 8570-1: Application for Pesticide Registration for Inspire Super® (EPA Reg. No. 100-1317), Switch® 62.5 WG (EPA Reg. No. 100-953), Vanguard® WG (100-828), and Cyprodinil Technical (EPA Reg. No. 100-811)
- Fourteen (14) Clean and Highlighted PDF version of the labels for the proposed new use: Inspire Super®, Switch® 62.5 WG, Vanguard® WG, and Cyprodinil Technical
- Six (6) EPA Form 8570-34: Certification with respect to Data Citation
- Twelve (12) EPA Form 8570-35: Data Matrices Private and Public
  - Three (3) technical active ingredients and three (3) proposed End-Use Products



If you have any questions or comments regarding this submission, please contact me at 336-632-2257 or by e-mail [teresa.cox@syngenta.com](mailto:teresa.cox@syngenta.com) or Stephanie Rutledge at 336-632-5970.

Sincerely,

A handwritten signature in cursive script that reads "Teresa S. Cox".

Teresa S. Cox  
Regulatory Product Manager  
Regulatory Affairs Department  
Syngenta Crop Protection, LLC

Enclosures

