



To Chemtura Turfcide and Terraclor customers,

As you now know, the Environmental Protection Agency (EPA) recently issued the Re-registration Eligibility Document (RED) for PCNB, the active ingredient used in Chemtura products with the brand names Terraclor<sup>®</sup> fungicide and Turfcide<sup>®</sup> fungicide.

In the re-registration process, EPA assessed the human health and environmental risks associated with PCNB using available data. Additionally, the Agency assessed the benefits associated with the registered uses of PCNB by a comparison with alternative products and their costs. As a result of this process, EPA concluded that there was insufficient data to alleviate their concerns about certain toxicological and environmental fate characteristics of PCNB. Further, the Agency determined that there was low benefit to maintaining the turf uses for PCNB from an efficacy and economic standpoint.

While this comes as unsettling news to you, Chemtura Corporation maintains its commitment to support the re-registration of PCNB. We are continuing to review the RED in its entirety, and will vigorously defend those uses we feel should be re-registered based on the technical and economic merits of the compound. During this defense process, please be assured that we will continue to provide you with the PCNB products you have come to depend on. Regardless of the final decision on the long term future of the turf uses, you can be confident that Turfcide and Terraclor products will be available to you for the 2006/2007 and 2007/2008 snow mold use seasons.

As part of the re-registration evaluation specific to turf, Chemtura had agreed to reduce exposure and risk by restricting applications to golf course tees, greens and fairways. Based on this agreement, EPA then conducted a ***Benefits and Cost Analysis of PCNB and Alternatives for Use on Golf Course Turf (Greens, Tees and Fairways), Cotton, Potatoes, Green Beans, and Cole Crops***, dated May 22, 2006. In this analysis, EPA makes the following conclusions-

1. 'BEAD (Biological and Economic Analysis Division) has identified several effective fungicides that are alternatives to PCNB for managing pink and gray snow molds on tees, greens and fairways on golf courses'.
2. 'Effective fungicide treatments without PCNB have been identified through numerous studies and are comprised of tank mixes of two or three fungicides of different chemistry'.
3. 'While PCNB can be an effective component of tank-mixes to manage snow molds, other fungicides for tank-mixing are available to golf course managers to manage these diseases as effectively as PCNB, and in several cases, more effectively than when PCNB is used.'
4. 'Use of alternatives avoids the phytotoxic effects experienced in some turf cultivars.'
5. 'There are several alternatives that will result in similar or moderately higher costs than PCNB, and potentially provide more effective control and lower risk of turf damage due to phytotoxicity'.
6. 'We anticipate that if PCNB were no longer available, golf courses that currently use PCNB would not experience substantial negative effects'.

As a result of the conclusions made in the analysis, EPA made a determination in the RED that the benefit of continued use of PCNB on golf course tees, greens and fairways is low, and therefore not eligible for re-registration. Chemtura strongly disagrees with this determination based on the following:

While it is true that effective alternatives are available, it is not true that such alternatives are of 'similar or moderately higher costs'. In fact, the lowest cost alternative treatment without PCNB is substantial, that being 43% higher than the low cost treatment containing PCNB, as shown in the following table developed by EPA in their benefit / cost analysis document:

**Chemtura Corporation**  
199 Benson Road  
Middlebury, CT 06749



Active Ingredient	Tank Mix and use rate per 1,000 square feet	Cost per 1,000 sq. ft	% increase vs. low cost PCNB trt.
Propiconazole + Fludioxonil	Banner Maxx (3-4 fl oz) + Medallion 50WP (0.5 oz)	\$17.70	222
Propiconazole + Fludioxonil + Chlorothalonil	Banner Maxx (3-4 fl oz) + Medallion 50WP (0.5 oz) + Daconil WS 6F (5.5 fl oz)	\$21.20	285
Propiconazole + Flutoloniil	Banner MAXX (4 fl oz) + ProStar 70WP (4 or 6 oz)	\$26.05	374
Propiconazole + Trifloxystrobin	Banner MAXX (2 fl oz) + Compass 50WG (0.2 oz)	\$9.95	81
Triadimefon + Flutoloniil	Bayleton 50WP (6 oz) + ProStar 70WP (4 oz)	\$40.60	638
Triadimefon + Trifloxystrobin	Bayleton 50WP (2 oz) + Compass 50WG (0.25 oz)	\$15.25	177
Iprodione + Chlorothalonil	Chipco 26019FLO 2F (4 fl oz) + Daconil 2787 4F (8 fl oz)	\$9.95	81
Iprodione + Chlorothalonil	Chipco 26019FLO 2F (4 fl oz) + Daconil Weather Stik 6F (5.5 fl oz)	\$7.85	43
Azoxystrobin + Propiconazole	Heritage 50WDG (0.4 oz) + Banner MAXX (3 or 4 fl oz)	\$20.20	267
Azoxystrobin + Propiconazole + Chlorothalonil	Heritage 50WDG (0.4 oz) + Banner MAXX (2 fl oz) + Daconil Weather Stik 6F (5.5 fl oz)	\$19.75	259
Azoxystrobin + Iprodione	Heritage 50WG (0.4 oz) + Chipco 26GT 2SC (8 fl oz)	\$19.65	257
Azoxystrobin + Chlorothalonil	Heritage 50WG (0.4 oz) + Daconil Weatherstik 6F (8.0 fl oz)	\$16.10	193
Azoxystrobin + Chlorothalonil	Heritage 50WG (0.4 oz) + Daconil Ultrex 82.5WDG (7.5 oz)	\$16.30	196
Fludioxonil + Chlorothalonil	Medallion 50WP (0.5 oz) + Daconil WeatherStik 6F (5.5 fl oz)	\$12.00	118
Propiconazole + PCNB	Banner MAXX 1.24MEC (3 fl oz) + Turfcide 400 (9 fl oz)	\$11.30	105
Triadimefon + PCNB	Bayleton 50WP (2 oz) + Turfcide 400 (10 fl oz)	\$13.15	139
Triadimefon + Trifloxystrobin + PCNB	Bayleton 50WP (2 oz) + Compass 50WG (0.25 oz) + Turfcide 400 (6 fl oz)	\$17.50	218
Iprodione + Chlorothalonil + PCNB	Chipco 26GT 2SC (4 fl oz) + Daconil Weather Stik 6F (5.5 fl oz) + Turfcide 400 (8 fl oz)	\$10.85	97
Chlorothalonil + PCNB	Daconil Weather Stik 6F (5.5 fl oz) + Turfcide 400 (8 fl oz)	\$6.55	19
Chlorothalonil + PCNB	Daconil Ultrex 82.5WDG (3.7 oz) + Turfcide 400 (9 fl oz)	\$6.00	9
Chlorothalonil + PCNB	Daconil Ultrex 82.5WDG (3.5 oz) + Turfcide 400 (8 fl oz)	\$5.50	0 (low cost treatment)
Azoxystrobin + PCNB	Heritage 50WG (0.4 oz) + Turfcide (6 fl oz)	\$13.25	141
Flutoloniil + PCNB	ProStar 70WP (4 oz) + Turfcide 400 (6 fl oz)	\$14.75	168

Source: Benefits and Cost Analysis of PCNB and Alternatives for Use on Golf Course Turf (Greens, Tees and Fairways), Cotton, Potatoes, Green Beans, and Cole Crops. U.S. EPA. May 22, 2006.

**Chemtura Corporation**  
199 Benson Road  
Middlebury, CT 06749



Finally, EPA's conclusion that 'We anticipate that if PCNB were no longer available, golf courses that currently use PCNB would not experience substantial negative effects' is certainly without merit, as EPA themselves stated that they did not directly evaluate the impact of possible pesticide cost increases to the economic viability of golf courses. It is the firm belief of Chemtura Corporation that such substantial cost increases imposed as a result of the loss of PCNB on turf will indeed impact the economic viability of golf courses.

To help you in determining the economic impact on your course, you will find a worksheet attached that you can use to easily compare the cost of your current PCNB treatment with the cost of the alternative treatment that you would use in the event that PCNB is no longer available. For those of you who received this document electronically with the worksheet attached as a separate file, the worksheet can be filled in on your computer using Microsoft Excel – you will only need to fill in the individual product treatment costs, and Excel will then automatically calculate the Total Treatment Costs, the \$ Increase In Cost and the % Increase In Cost.

So how can you help? As part of the re-registration process, EPA is required to provide stakeholders with a 60 day period during which time they can submit comments challenging the Agency's regulatory conclusions in the RED. These challenges must directly address the technical and / or benefits assessments used in making the re-registration decisions. If you, too, believe that PCNB is beneficial on turf, and that the loss of turf uses will impact the economic viability of golf courses, we strongly encourage you to send your comments to EPA by one of the following methods-

***To send comments electronically via the internet:***

Go to <http://www.regulations.gov>. In the search screen, simply enter the ID no. **EPA-HQ-OPP-2004-0202** into the 'Keyword or ID' field and click on 'Submit'. You will then be taken to the next screen where you will choose 'Add Comment', found in the far right column.

***To send written comments via U.S. mail:***

Office of Pesticide Programs  
Regulatory Public docket (7502P)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

**Note:** Be sure to reference the Docket ID no. EPA-HQ-OPP-2004-0202 on all written correspondence.

Please note that all comments must be received by EPA on or before October 2.

Chemtura Corp. thanks you for your support of PCNB products, and appreciates your patience and understanding as we defend PCNB through the re-registration process.

**Chemtura Corporation**  
199 Benson Road  
Middlebury, CT 06749