

66330-243

03/20/2009

1/18



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Bill Washburn  
Arysta LifeScience North America, LLC  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

MAR 20 2009

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4 and 98-10  
Storage & Disposal and Other Changes

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated January 27, 2009 for:

**EPA Registration 66330-243**

**Mepichlor Pill**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and 98-10, and finds that the label change(s) requested falls within the scope of PRN-2007-4 and 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Banza Djapao of my staff at 703-305-7269.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

2/18

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

 <b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other:	OPP Identifier Number
---	---	---	-----------------------

**Application for Pesticide - Section I**

1. Company/Product Number <b>66330-243</b>	2. EPA Product Manager <b>TONY KISH</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>MEPICHLOR PILL</b>	PM# <b>22</b>	
5. Name and Address of Applicant (Include ZIP Code)  <b>Arysta LifeScience North America, LLC 15401 Weston Parkway, Suite 150 Cary, NC 27513</b>		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:  EPA Reg. No. _____ Product Name _____

**NOTIFICATION**  
**MAR 20 2009**

Check if this is a new address

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**Notification of label change per PR Notice 2007-4.** This notification is consistent with guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 USC Sec 1001 to willfully make any false statement to EPA. I further understand that if the amendment is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Notification of label change per PR Notice 98-10.** This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt.    No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container  1.0 lb., 3.0 lb., 5 lb., and 10 lb.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____	
				<input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>Bill Washburn</b>	Title <b>Regulatory Manager</b>	Telephone No. (Include Area Code) <b>901-432-5118</b>
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete, acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature  <i>Bill Washburn</i>	3. Title <b>Regulatory Manager</b>	
4. Typed Name <b>Bill Washburn</b>	5. Date <b>01/27/09</b>	



January 27, 2009

Mr. Tony Kish, PM 22  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs – 7504P  
U.S. Environmental Protection Agency  
One Potomac Yard, Room S-4900  
2777 South Crystal Drive  
Arlington, VA 22202

**Subject: MEPICHLOR PILL  
EPA Reg. No. 66330-243**

***Notification of Label Change per PR Notice 2007-4  
and PR Notice 98-10***

Dear Mr. Kish:

Please find the following enclosed:

- Application for Pesticide Registration (Other) dated 01/27/09.
- One highlighted copy of subject label, showing all changes.
- One clean copy of the subject label.

Notification of label change per PR Notice 2007-4. This notification is consistent with guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 USC Sec 1001 to willfully make any false statement to EPA. I further understand that if the amendment is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Also in this submission, we are using PR Notice 98-10 to update the name of the company, emergency telephone numbers and warranty. Arysta LifeScience North America Corporation was changed to Arysta LifeScience North America, LLC.

Please acknowledge acceptance of this notification by stamping the extra copy of this letter and returning in the enclosed self-addressed stamped envelope. Should you have any questions or comments, please do not hesitate to contact me at 901-432-5118 or by e-mail at [bill.washburn@arystalifescience.com](mailto:bill.washburn@arystalifescience.com)

Sincerely,

Bill Washburn  
Regulatory Manager





6/18

PR Notice 2007-4

Engineering Controls Statement: When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240(d) (4-6)], the handler Personal Protective Equipment requirements may be reduced or modified as specified in the Worker Protection Standard.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment washwaters.

**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, 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 12 hours.

Personal Protective Equipment 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:

- 1) Coveralls
- 2) Chemical-resistant gloves made of any waterproof material
- 3) Shoes plus socks

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in original container only, in a cool, dry, locked area. Tightly close or re-seal partially used containers to minimize moisture absorption. Store separately from other pesticides, fertilizers, food or feed to prevent contamination. In case of a spill or broken container, call CHEMTREC at 1-800-424-9300.

**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 by use 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:** Nonrefillable container. Do not reuse or refill this container. Completely empty package into application equipment. Offer for recycling, if available, or dispose of empty package in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. Stay out of smoke from burning bags.

**GENERAL INFORMATION**

Do not apply this product through any type of irrigation system.

MEPICHLOR PILL is a dry, concentrated "pill" form of the chemical active ingredient used in the liquid products sold by BASF Corporation under the PIX Brand name and by Micro Flo under the brand name Mepichlor 4.2% Liquid. This pill form of Mepiquat Chloride has been designed to be easy and economical to use and for easy container disposal. The sizes have been chosen so that one "pill" will be equivalent to one quart of 4.2% Liquid product.

MEPICHLOR PILL is a foliar applied plant regulator. It allows the grower to manage the cotton plant for short-season production leading to reduced risk of yield and quality loss due to delayed and prolonged harvest. Benefits derived from the use of MEPICHLOR PILL include increased early boll retention and/or larger bolls, reduced plant height which provides a more open canopy, less boll rot, improved defoliation, less trash and lower ginning costs, better harvest efficiency and a darker leaf color. These benefits can provide for earlier maturity and often result in improved yields.

4





**Timing for Late Season Applications**

A. On fields where cotton cuts out and then starts regrowth: apply when regrowth begins, as evidenced by new leaves in the terminal and stem elongation. This would often, but not always, be in the period of 5-6 weeks after the first bloom.

B. On fields where cotton never completely cuts out, apply Mepichlor Pill when there are 4-6 nodes above the white flower (NAWF). Measure NAWF by counting the number of mainstem nodes from the first position white bloom (the one closest to the mainstem) to the terminal. Count the node with the first position white bloom as zero and the last node in the terminal, which is counted, should have a leaf at least the size of a quarter. Generally, the NAWF first reaches 4-6 during the fourth to sixth week of bloom. During this time period, the NAWF should be decreasing about one node every 5-6 days - if its rate of decrease is less, this means that the plant is not cutting out soon enough (the crop is too vigorous). If the fifth week of bloom arrives and NAWF is still above 5-6, apply Mepichlor Pill.

**Use Rate for Late Season Application**

Mepichlor Pill should be applied at a rate between 1/4th to 3/4ths pill per acre. Use the lower rate range on cotton with only moderate additional growth potential, and the higher rate range on fields likely to continue vigorous growth. Total seasonal use per season (early plus late application) must not exceed 1 1/2 pills per acre.

**Spray Volumes: Thorough coverage is required.**

**In Water:**

**Areas other than California:**

Ground Application - Use a minimum of 2 gallons of water per acre.

Aerial Application - Use a minimum of 2 gallons/acre.

**California Only:**

Ground Application - Use a minimum of 5 gallons/acre.

Aerial Application - Use a minimum of 5 gallons/acre.

**In Oil:**

Do not attempt to add MEPICHLOR PILL directly to oil in spray tank. Instead, dissolve MEPICHLOR PILL in water before adding to an oil with added emulsifiers. Do a jar test for compatibility before attempting to mix large quantities.

Use a minimum total oil volume of 2 pints/acre for ultra low volume (ULV) aerial application. Application in oil is permitted only in AL, AR, FL, GA, LA, MO, MS, NC, OK, SC, TN and TX. Use a

PR Notice 2007-4

non-phytotoxic oil concentrate which contains either a petroleum or vegetable oil base, contains only EPA-exempt ingredients, provides good mixing quality in the jar test (see "Compatibility" section), and has been used successfully in your locality. The oil diluent should contain emulsifiers which provide good mixing quality. If the oil does not contain an emulsifier, one must be added during mixing at a volume equal to 3% of the final volume of the mixing tank. Do not apply Mepichlor Pill as ULV without using emulsifiers. If using a vegetable oil based product, only highly refined concentrates should be used.

Mix under constant and vigorous agitation. Pour one-half of the required volume of oil into the spray tank, followed by the emulsifier (if the oil does not already contain one) at approximately 3% of the final spray tank volume, and then add MEPICHLOR PILL while the remainder of the oil is added. Constant agitation is required during and after mixing and during application.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

**AERIAL DRIFT REDUCTION ADVISORY INFORMATION**  
**Information on Droplet Size**

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....



**Wind**

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

**Temperature and Humidity**

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

**Temperature Inversions**

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

**Sensitive Areas**

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

Rain Wash-off Precaution:

''''  
''''  
''''

The use of a high quality, EPA exempt surfactant will enhance the uptake of MEPICHLOR PILL into the plant. Therefore, the use of a surfactant allows applications made as little as 4 hours prior to rainfall to be effective. Without a surfactant, the product should be used at least 8 hours prior to the expected rainfall.

''''  
''''  
''''

PR Notice 2007-4.

**Compatibility:**

MEPICHLOR PILL is compatible with most insecticides and miticides. MEPICHLOR PILL SHOULD ALWAYS BE ADDED TO THE SPRAY SOLUTION FIRST. If MEPICHLOR PILL is added after boron, emulsifiable concentrates or liquid flowable products, additional dissolving time is necessary. If compatibility is in doubt, perform a jar test to check for compatibility. MEPICHLOR PILL can be used with foliar fertilizers if your experience shows the combination is compatible and will not injure cotton under your conditions. Caution should be used when applying with foliar fertilizers under conditions of extreme heat.

**Restrictions and Limitations:**

Insect or mite damage to MEPICHLOR PILL treated crops can lead to yield decreases or other undesirable effects.

Do not apply MEPICHLOR PILL to cotton that is under stress. If using low rate multiple applications, discontinue use until your crop has overcome any stress.

Do not apply more than 1 1/2 MEPICHLOR PILLS per acre per season. The sum of all products and formulations containing mepiquat chloride must not exceed 0.132 pounds (60 grams) of mepiquat chloride per acre per season.

Do not apply MEPICHLOR PILL within 30 days of harvest.

Do not graze or feed cotton forage to livestock.

MEPICHLOR PILL forms a clear solution when added to water. Effectiveness is not related to the color of the spray solution of MEPICHLOR PILL products.

Do not tank mix with other products other than those mentioned under "Compatibility".

Do not plant another crop within 75 days after last treatment.

Time and rate of application: Short-staple and long staple (Pima) cotton

Directions for use should be observed as specified below:

I. High Rate Single or Multiple applications:

Use these instructions when you are not able to start growth regulation treatments early, or when you want to make the fewest number of applications.

14/18

AREA	TIME OF APPLICATION	RATE PER ACRE
AL, AR, AZ, CA, FL, GA, LA, MO, MS, NM, NC, SD, TN, VA	<p>First application: Apply when cotton is actively growing and is between 20" and 30" tall, but not more than 7 days beyond early bloom (5-6 blooms per 25 row feet). Also apply if cotton is 24" tall and has no bloom.</p> <p>Use 1/4 pill per acre rate on cotton where excessive vegetative growth is not expected and use 1/2 pill per acre in areas where excessive vegetative growth has historically occurred See Restrictions and Limitations.</p>	1/4th to 1/2 pill
	<p>Second application: Make another application in 2 to 3 weeks if additional growth control is desired.</p>	1/4th to 1/2 pill
	<p>Third application for control of excessive growth: If the cotton field has a history of vigorous growth or if conditions continue to favor vigorous growth, apply a third application 1 to 2 weeks after the second application.</p>	1/4th to 1/2 pill
	<p>Late season application: See section titled "Late Season Application of Mepichlor Pill".</p>	1/4th to 3/4ths pill
OK, TX, (except Rio Grande Valley)	<p>Areas <u>without</u> a history of excessive vegetative growth:</p> <p>First application: Apply when cotton is in early bloom stage (5-6 blooms per 25 row feet) and actively growing. Also apply if no blooms are present and the cotton is 20" tall and actively growing. See Restrictions and limitations.</p>	1/4th pill
	<p>Second application: Make a second application in 3-4 weeks if additional growth control is desired.</p>	1/4th pill

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....



**SEE CONVERSION CHART AT END OF DIRECTIONS FOR USE**

**II. Low-rate multiple applications:**

Use these instructions when you want to maintain maximum flexibility in plant regulation treatments.

AREA	TIME OF APPLICATION	RATE PER Excessive Growth Not Expected or Lower Rates Have Worked in the Past.	ACRE Excessive Growth Expected or Higher Rates Have Been Necessary in the Past.
AL, AR, AZ, CA, FL, GA, LA, MO, MS, NC, NM, OK, SC, TN, TX, VA	First application: Apply at the matchhead square <sup>1</sup> stage of growth.	1/16th pill	1/8th pill
	Second application: 7-14 days later, or when regrowth occurs.	1/16th pill	1/8th pill
	Third application: 7-14 days later, or when regrowth occurs.	1/16th to 1/8th pill*	1/8th to 1/4th pill*
	Fourth application: 7-14 days later, or when regrowth occurs.	1/16th to 1/4th pill *	1/8th to 3/8ths pill*
	Fifth application: (If needed): 7-14 days later, or when regrowth occurs.	1/8th to 1/4th pill*	1/8th to 3/8ths pill*
	Late season application: See section titled "Late Season Application of Mepichlor Pill".	1/4th to 1/2 pill*	3/8ths to 3/4ths pill*

\* Use the higher rate if previous application was not made or if growing conditions favor excessive growth.

<sup>1</sup> Matchhead square is when the first square of a typical cotton plant is 1/8 - 1/4" in diameter. Make the first application when 50% of the plants have one or more matchhead squares.



**CONVERSION CHART**

Use this chart to compare MEPICHLOR PILL and liquid equivalents.

<b>MEPICHLOR PILL</b>	<b>MEPICHLOR 4.2% LIQUID</b>
1/16th pill	2 fl. oz.
1/8th pill	4 fl. oz.
1/4th pill	8 fl. oz.
3/8ths pill	12 fl. oz.
1/2 pill	16 fl. oz.
3/4ths pill	24 fl. oz.
1 pill	32 fl. oz.

**Warranty and Disclaimer Statement**

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Arysta LifeScience North America, LLC ("Arysta"), and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

Arysta 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 described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Arysta, and is subject to the inherent risks described above.

**TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION,**

