

464-711

4/9/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Maureen Miksztal
Senior Regulatory Specialist
Dow Chemical Company
1803 Building
Midland, MI 48674

APR 9 2010

Re: **Registration Review** for Propionic Acid, Grain Preserver Grade
EPA Registration 464-711
Decision Number 405144
Response to EPA/SRRD Email Dated 12/11/08

Dear Ms Miksztal:

The Agency is in receipt of your revised label submitted January 21, 2009, and has confirmed the specified language with respect to the baling of hay has been added as requested. As previously noted, this change ensures negligible environmental exposure, and therefore allows the Agency to proceed with a final registration review decision without data call in for the following:

- 850.4100 Seedling Emergence, Tier 1
- 850.4150 Vegetative Vigor, Tier 1
- 830.7050 Ultraviolet/Visible Absorption

The label is acceptable provided the following change is made: Change the Container Disposal instructions to those shown on your revised label that you submitted as a Notification on February 1, 2010 (EPA Decision No. 428278).

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supercedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

The Agency has determined that the registrant may distribute and sell propionic acid products bearing old labels/labeling for 12 months from the date of issuance of this letter. Registrants and persons other than the registrant remain obligated to meet existing stocks requirements applicable to products they sell or distribute.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,
Shaja B. Joyner

Shaja B. Joyner
Product Manager (20)
Fungicide Branch
Registration Division (7504P)

Enclosure: Label stamped "Accepted with Comments"

Propionic Acid, Grain Preserver Grade

FIRST AID:	
IF IN EYES:	<ul style="list-style-type: none"> Wash immediately and continuously with flowing water for at least 30 minutes. Remove contact lenses after the first 5 minutes and continue washing. Obtain prompt medical consultation, preferably from an ophthalmologist.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> Call a poison control center or a doctor immediately for treatment advice. Give one cup (8 ounces or 240 mL) of water or milk if available and transport to a medical facility. DO NOT INDUCE VOMITING. Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN: Aspiration may cause lung damage. Probable mucosal damage may contraindicate the use of gastric lavage.	
HOT LINE NUMBER	
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect (989)636-4400. Have the MSDS, and if available, the product container or label with you when calling a poison control center or a doctor, or going for treatment.	

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not discharge effluent containing this active ingredient into lake waters unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of EPA.

PHYSICAL AND CHEMICAL HAZARDS

COMBUSTIBLE! Keep away from heat and open flame.

STORAGE AND DISPOSAL

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

61559
(01/09) PE0109

Pesticide Storage:

Keep away from heat and open flame. Keep container closed during storage.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinse 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

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, (non-aerosol) or by other procedures approved by state and local authorities.

Net Contents: Drum or Tote

CONTAINER SIZE DRUM PLASTIC	CONTAINER SIZE DRUM STEEL	CONTAINER SIZE TOTE	SHIPPING NAME	PROPIONIC ACID	
208 kg / 458.6 lb NET WEIGHT	202 kg / 445.3 lb NET WEIGHT	564.7 kg / 1,245 lb NET WEIGHT	HAZARD CLASS 8, 3	ID NUMBER UN3463	PG II

An inhibitor for control of molds and fungi in cowpea hay, peanut hay, peavine hay and soybean hay and high-moisture stored corn, oats, barley, wheat or sorghum to be used as livestock or poultry feed.

Active Ingredient: Propionic Acid ¹	99.5%
Inert Ingredients	0.5%
	100%

¹This product meets specifications as set forth in the Food Chemicals Codex Compendium.

EPA Reg. No. 464-711
EPA Est. No. 10352-TX-1

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

**KEEP OUT OF REACH OF CHILDREN
CORROSIVE • CAUSES IRREVERSIBLE
EYE DAMAGE AND SKIN BURNS •
HARMFUL AND CORROSIVE IF
SWALLOWED • HARMFUL IF INHALED OR
ABSORBED THROUGH SKIN**

Do Not Get In Eyes, On Skin, On Clothing • Do Not Swallow • Avoid Breathing Vapors or Mist • Wear Safety Goggles And/Or Face Shield • Wear Protective Clothing And Chemical Resistant Gloves • Wash Thoroughly With Soap And Water After Handling • Remove Contaminated Clothing and Wash Before Reuse • Avoid Working Near High Concentrations Of Spray Mist/Vapor • Use Adequate Ventilation • Wear Chemical Resistant Gloves, Chemical Resistant Aprons, Chemical Resistant Footwear And Goggles Or Face Shield When Loading Application Equipment Unless A Closed Loading System Is Used.

Produced for:



The Dow Chemical Company
Midland, Michigan 48674 U.S.A.
(989)636-4400

®TM Trademark of The Dow Chemical Company
("Dow") or an affiliated company of Dow
Made in U.S.A.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its label. Read entire label. Use strictly in accordance with precautionary statements and directions for use.

General Directions

Use treated grain for animal feed only. Treatment inhibits germination; do not use on grain intended for seed or malting, or for use in human foods. Grain preserved with propionic acid is classified as "sample grade" due to persistent odors from chemical treatment.

Do not store treated grain with untreated grain or forage in the same storage area. Thoroughly clean all storage areas prior to use.

Apply anti-corrosive paint to all metal and concrete storage surfaces to prevent corrosion and grain molding due to acid neutralization.

WEATHERPROOF STORAGE OF HIGH-MOISTURE GRAINS

Follow all General Directions given above.

Protect grain from outside moisture in metal or wooden bins, converted cribs, Quonset huts, or other roofed buildings.

Waterproof floor; ventilate headspace to prevent condensation in storage area.

Do not store in upright tile, stave, or concrete silos, bunker silos, or on ground in plastic-covered piles.

Follow normal aeration procedures to prevent moisture condensation and migration.

Use the treatment rates as given in the following tables:

Determine moisture content of freshly harvested grain and treat within 4 hours of harvest. Adjust treatment rate as detailed below depending on moisture content and type or length of storage.

Do not treat in the rain. Allow rain to soak into the pile and test for moisture content before continuing treatment.

Thoroughly mix acid and grain by spraying acid on grain in auger while moving to storage. Stop auger immediately if spray failure occurs. Establish auger throughput and set flowmeter to apply proper rate of acid.

Apply this product only at the recommended rates.

Flush out application and handling equipment with water after acid application is completed.

RECOMMENDED RATES OF PROPIONIC ACID/TON OF MOIST CORN IN COVERED STORAGE

Duration of Storage	Moisture Content of Corn, Percent by Weight		
	up to 20%	21 to 30%	31 to 35%
Up to 6 months	8 lbs. or 1 gallon	12 lbs. or 1.5 gallons	16 lbs. or 2 gallons
Up to 12 months	12 lbs. or 1.5 gallons	16 lbs. or 2 gallons	20 lbs. or 2.5 gallons

**Not recommended if grain is to be stored after May 1

RECOMMENDED RATES OF PROPIONIC ACID/TON OF MOIST SORGHUM, WHEAT, OATS OR BARLEY IN COVERED STORAGE

Moisture Content of Grain, Percent by Wt.	Rate of Propionic Acid for Covered Storage of Moist Grains	
	lbs. acid/ton of grain	gals. acid/ton of grain
16	11	1.3
18	13	1.6
20	15	1.8
22	17	2.0
24	19	2.3
26	21	2.5
28	23	2.8
30	25	3.0
32	27	3.3
34	29	3.5
36	31	3.7

**These rates protect stored sorghum, wheat, oats or barley up to 12 months.

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OUTDOOR STORAGE OF HIGH-MOISTURE CORN GRAIN ONLY

Follow all General Directions given above.

Unprotected large pile storage is recommended only in the following areas of low-precipitation: Nebraska (excluding SE corner) Western Kansas, Western Oklahoma, Texas Panhandle, Eastern New Mexico, Eastern Colorado and SE Wyoming.

Corn grain stored in this manner must be fed out before May First.

Bunkers, pits, or slabs are accepted storage facilities, provided:

- the floors are concrete or asphalt; do not store grain on dirt surfaces.
- any dirt or wood walls should be lined with plastic; do not cover grain surface with plastic.
- seal and construct storage areas to prevent water entry; slope floor area for drainage.

Plan storage for maximum access. Feed out corn along one side of bunkers or pits; or by rotation around slab piles.

Use the following treatment rates, testing moisture content of each load and treating within 4 hours of harvest. Do not treat or store grain over 28% moisture content.

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

APR 9 2010

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.**

464-711

Moisture Content of Grain, Percent by Wt.	Rate of Propionic Acid for Open Storage of Moist Corn	
	lbs. acid/ton corn	gals. acid/ton corn
16	11	1.3
18	13	1.6
20	15	1.8
22	17	2.0
24	19	2.3
26	21	2.5
28	23	2.8

Treated grain should be stored in long, rounded piles. Avoid peaks and valleys, smooth footprints and other depressions. Temperature Monitoring. Sharp increases in grain temperature signal potential spoilage. Thermocouple or hand temperature probes are suggested. They may be placed at various spots around the pile and should be read weekly. Localized melting of snow or frost, steam, and seepage are other indicators of spoilage.

STORAGE OF COWPEA HAY, PEANUT HAY AND SOYBEAN HAY

This product may only be used during the baling process if appropriate baler equipment is used which prevents exposure of non-target organisms to this pesticide product. Do not apply to pre-harvest hay and straw, cut hay and straw in the field prior to baling, or to hay and straw after it has been baled. Apply product to the hay and straw as it is fed into the baler, using the rates on this label. The baler application equipment must prevent drippage and drift, and must function properly and be used/maintained in accordance with the manufacturer's written operation instructions.

Propionic acid is applied undiluted to hay with a low-pressure spray system equipped with adequately arranged and calibrated nozzles to hay just prior to baling. The application rate is 8 - 31 pounds/ton of the active ingredient.

LIMITED WARRANTY AND DISCLAIMER

Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label when used in accordance with directions under normal conditions of use. THE WARRANTIES MADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES.