

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OCT 13 2011

Stephen A. Adams Monsanto Company 1300 I Street, NW Suite 450 East Washington, DC 20005

Subject:

Supplemental Label to Define Labeling for the Monsanto Smart-Pak Container

Roundup Power Max Herbicide

EPA Reg. No. 524-549

Date Submitted: July 15, 2011

Dear Mr. Adams:

The supplemental labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

At your next label printing, or within eighteen (18) months of the date of this letter, whichever comes first, you must incorporate this supplemental labeling into the main product labeling. A stamped copy of your label is enclosed for your records.

If you have any questions regarding this letter, please contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis Product Manager 25 Herbicide Branch

Registration Division (7505P)

SUPPLEMENTAL LABELING

THIS SUPPLEMENTAL LABEL IS INTENDED TO BE USED ONLY TO DEFINE THE LABELING OF THE MONSANTO SMARTPAK CONTAINER AND IS NOT INTENDED TO BE DISTRIBUTED FOR USE IN THE FIELD.

RD 1617 Herbicide

Alternate Brand Names: Roundup PowerMAX® Herbicide

EPA Reg. No. 524-549
Roundup PowerMAX and Roundup Ready are trademarks of Monsanto Company

OCT 13 2011

Under the Federal Insecticide, pungloide, and Rodenticide Act, as amended, for the postloide registered under RPA Reg. Ho. 524-549

Smart-Pak Container Label

[OUTERMOST CARDBOARD PACKAGING]

[Front Panel]

[INSERT BRAND NAME] (logo)

GROUP 9 HERBICIDE

AVOID CONTACT OF THIS HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS (EXCEPT AS SPECIFIED FOR INDIVIDUAL ROUNDUP READY® CROPS), DESIRABLE PLANTS AND TREES, AS SEVERE INJURY OR DESTRUCTION COULD RESULT.

Keep out of reach of children

CAUTION!

[Optional text, if applicable: See precautions on side panel]

ACTIVE INGREDIENT:

*Glyphosate, N-(phosphonomethyl)glycine, in the form of its potassium salt	48.7%
OTHER INGREDIENTS:	51.3%
	100.0%

*Contains 660 grams of the active ingredient glyphosate, in the form of its potassium salt, per liter or 5.5 pounds per U.S. gallon, which is equivalent to 540 grams of the acid, glyphosate, per liter or 4.5 pounds per U.S. gallon.

EPA Reg. No. 524-549

[Additional labeling]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals Keep out of reach of children

CAUTION!

CAUSES MODERATE EYE IRRITATION

Avoid contact with eyes, skin, or clothing

FIRST AID: C	all a poison control center or doctor for treatment advice.
IF IN EYES	 Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses if present after the first 5 minutes then continue rinsing eye.
IF ON SKIN	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes.

- Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
- You may also contact (314) 694-4000, collect day or night, for emergency medical treatment information.
- This product is identified as [INSERT BRAND NAME], EPA Registration No. 524-549.

DOMESTIC ANIMALS: This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

Personal Protective Equipment (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear: long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride.

Follow manufacturer's instructions for cleaning/maintaining PPE (Personal Protective Equipment). If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

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 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

User Safety Recommendations

Users should:

- · Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- · Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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 contaminate water when cleaning equipment or disposing of equipment wash waters.

Physical or Chemical Hazards

Spray solutions of this product can be mixed, stored and applied using only stainless steel, fiberglass, plastic or plastic-lined steel containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas, which can form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. This product can only be used in accordance with the Directions for Use on this label or in separately published Monsanto supplemental labeling. Supplemental labeling can be obtained from your Authorized Monsanto Retailer or Monsanto Company Representative.

STORAGE AND DISPOSAL

Proper pesticide storage and disposal are essential to protect against exposure to people and the environment due to leaks and spills, excess product or waste, and vandalism. Do not allow this product to contaminate water, foodstuffs, feed or seed by storage and disposal.

PESTICIDE STORAGE: Store pesticides away from food, pet food, feed, seed, fertilizers, and veterinary supplies. Keep container closed to prevent spills and contamination. Do not store this container unprotected from the weather, especially precipitation, for extended periods of time. DO NOT REMOVE INNER PLASTIC CONTAINER FROM THE PACKAGE UNTIL IT HAS BEEN EMPTIED AND PROPERLY RINSED.

PESTICIDE DISPOSAL: To avoid wastes, use all material in this container, including rinsate, by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program. Such programs are often run by state or local governments or by industry. All disposal must be in accordance with applicable federal, state and local regulations and procedures.

CONTAINER HANDLING AND DISPOSAL: Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse (or equivalent) the inner plastic container promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle into the inner plastic container through the opening in the cardboard packaging at the bottom of the container, ensuring that you puncture the inner plastic container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Once properly rinsed, open the outer cardboard packaging and remove the inner plastic container. Some agricultural plastic pesticide containers can be taken to a container collection site or picked up for recycling. [Optional container disposal statement: To find the nearest site, contact your chemical dealer or [INSERT COMPANY NAME] at [INSERT PHONE NUMBER].] Recycle the cardboard separately. If recycling is not available, dispose of each component in accordance with federal, state and local regulations and procedures, which may include puncturing the properly rinsed inner plastic container and disposing both the outer cardboard packaging and inner plastic container in a sanitary landfill.

[Alternate container disposal statement: Then offer the outer cardboard packaging and inner plastic container for recycling, if available. If recycling is not available, dispose of each component in

accordance with federal, state and local regulations and procedures, which may include puncturing the properly rinsed inner plastic container and disposing both the outer cardboard packaging and inner plastic container in a sanitary landfill.]

[Optional container statement: This package is not to be sold to homeowners for residential use.]

Read the entire label before using this product. [Optional text: See label booklet for Complete Directions for Use.]

EPA Est. 524-IA-1; EPA Est. 524-LA-1 [Optional text: Other EPA Est.]

[Alternate text: EPA Est. (L) 524-LA-1 or (M) 524-IA-1 Lot number prefix (L) and (M) indicate appropriate establishment number.]

3 GALLONS [Alternate text: 3 GAL]

CROPSHIELD, Roundup PowerMAX, Roundup Ready, Monsanto and the Vine symbol are trademarks of Monsanto Technology LLC.

[Insert Monsanto Vine symbol (logo)]

Packed for:

MONSANTO COMPANY 800 N. LINDBERGH BLVD.

ST. LOUIS, MISSOURI 63167 USA

[Insert print plate number and barcode(s) as applicable]

[Insert lot number]

[Top panel]

DO NOT REMOVE INNER PLASTIC CONTAINER FROM THIS PACKAGE UNTIL IT HAS BEEN EMPTIED AND PROPERLY RINSED.

[INNER PLASTIC CONTAINER]

[INSERT BRAND NAME] (logo optional)

GROUP	9	HERBICIDE
	\$1000 BEAUTY STREET	

Keep out of reach of children

CAUTION!

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OTHER INGREDIENTS:	51.3%
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^{*}Contains 660 grams of the active ingredient glyphosate, in the form of its potassium salt, per liter or 5.5 pounds per U.S. gallon, which is equivalent to 540 grams of the acid, glyphosate, per liter or 4.5 pounds per U.S. gallon.

EPA Reg. No. 524-549

UNLESS THIS PLASTIC CONTAINER IS EMPTY AND HAS BEEN PROPERLY RINSED FOR DISPOSAL, IT IS NOT INTENDED TO BE REMOVED FROM ITS OUTER CARDBOARD PACKAGING.

FOR MORE INFORMATION CALL 1-800-ROUNDUP (1-800-768-6387) OR COLLECT AT 314-694-4000.

[OPTIONAL LABEL STATEMENTS]

Herbicide for Roundup Ready® Crops

The complete broad-spectrum postemergence herbicide for weed control in many agricultural systems

Selective broad-spectrum weed control in Roundup Ready crops

Non-selective, broad-spectrum weed control for many agricultural systems and farmsteads

Transorb® (Logo)

Transorb® II Technology (Logo)

Trisorb® (Logo)

CROPSHIELD™ Formulation

CROPSHIELD Formula - Specially formulated for Roundup Ready Crops (Logo)

Roundup - Powerful Performance at a Practical Price

A member of the Roundup Family of Agricultural Herbicides by Monsanto

Use only according to label instructions.

For product information or assistance in using this product, call toll-free 1-800-332-3111

Read the "LIMIT OF WARRANTY AND LIABILITY" statement [optional text: that appears in the label booklet] before buying or using. If terms are not acceptable, return at once unopened.

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

This product is protected by U.S. Patent No. 6,544,930; other patents pending. No license granted under any non-U.S. patent(s). [patent information subject to change and modification at the time of printing.]

[Optional label statements related to the Smart-Pak]

Easy to Handle

Uses less plastic than ordinary [optional alternative: typical] jugs

Produces less plastic waste than ordinary [optional alternative: typical] jugs

Compact Design

Space Efficient

Stackable

Easy to Use

Easy to Pour

Easy to Recycle

This supplemental label expires on October 15, 2014 and must not be used or distributed after this date.