524-606 8/30/2012 1/11

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7511P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
524-606	AUG 30 2012

Term of Issuance: Conditional

NOTICE OF PESTICIDE:
_x_ Registration
___ Reregistration
(under FIFRA, as amended)

Name of Pesticide Product:
MON 89034 x MON 88017 RIB Complete™

Name and Address of Registrant (include ZIP Code):
Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63137

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, provided that you comply with the following terms and conditions.

1] The subject registration will automatically expire on midnight September 30, 2013.

2] The subject registration will be limited to a field corn seed blend containing up to 90% MON 89034 x MON 88017 and a minimum of 10% non-*Bt* seed that when planted creates an interspersed refuge within the field.

3] Submit/cite all data required for registration of your product under FIFRA § 3(c)(5) when the Agency requires registrants of similar products to submit such data.

4] Submit or cite all data required to support MON 89034 x MON 88017 plant-incorporated protectant products within the timeframes required by the terms and conditions of EPA Registration Number 524-576.

5] Provided the registration expiration date is extended, submit an interim report providing the following data and information within one year and a final report within two years:

Signature of Approving Official:	Date:
[signature]	30 Aug 2012

EPA Form 8570-6

To address the potential for resistance development in European Corn Borer (ECB) and Southwestern Corn Borer (SWCB)

• Submit revised modeling incorporating the structural elements recommended by the SAP (explicit larval movement, switch from a frequency-based model to one including density dependent larval mortality, epistatic mechanisms for resistance in target pests), with separate analyses for SWCB and ECB. Monsanto must include non-uniform oviposition in the modeling for both ECB and SWCB, especially (but not only) for the second generation of adults, which will more likely lay eggs on *Bt* rather than on damaged (or crowded out) non-*Bt* refuge plants in seed blends.

• Submit biological research on adult movement (related to mating and movement from refuges), larval movement, larval feeding (i.e., selective feeding within com ears or on pollen), survival of heterozygote genotypes on MON 89034 x MON 88017 (markers may need to be determined for heterozygotes), and the potential for epistatic mechanisms of resistance (particularly with older instars).

To address the potential for resistance development in Corn Earworm (CEW)

• CEW can have up to six generations per year in the southern U.S. and may be at greater risk for resistance in a seed blend environment. Submit CEW modeling for product durability that addresses the following concerns:

a. CEW will encounter a mosaic of *Bt* expression in kernels of refuge corn ear as well as in *Bt* corn ear. Seed blends containing *Bt* and non-*Bt* seeds may actually accelerate resistance in ear-feeding Lepidoptera including corn earworm and fall armyworm. *Bt* ingestion has shown to promote wandering in larvae, and individuals that receive a sublethal dose may move to another kernel. Horner et al. 2003 evaluated feeding patterns of CEW in MON81 0 and non-*Bt* maize and determined that larvae had greater movement on *Bt* ears and essentially sampled kernels at greater frequency than their counterparts who fed exclusively and in a more compact fashion on non-*Bt* corn ears. This ability to move to another source of kernel in this mosaic of toxins (lethal vs. sublethal) and also to a nontoxin environment will give heterozygous individuals a great fitness advantage: the functional dominance of the resistance allele will increase. (Porter 2011, personal communication)

b. Horner and Dively (2003) found that CEW exposed to Cry1Ab had reduced cannibalistic behavior which, they hypothesize, could serve as a mechanism to increase the selective differential between susceptible and resistant CEW and essentially lead to greater resistance evolution. (Cannibalistic behavior results " in partially resistant larvae feeding on nontoxic food [their fellow intoxicated larvae], thus temporarily providing escape from exposure to the *Bt* endotoxin.")

c. CEW development on *Bt* corn is delayed (Sims et al. 1996, Storer et al. 2001). This could enable a fraction of adult CEW to mate with CEW emerging from *Bt* cotton. Discretely breeding populations could become continuously breeding for part of the year in this scenario. This may be an important aspect to incorporate into IRM models of the

south where corn and cotton are host plants of the same pest. Theoretical explorations are needed to assess effects of this delayed development on corn on the resistance evolution in CEW.

6] Implement the following Insect Resistance Management (IRM) Program for MON 89034 x MON 88017 seed blend corn.

a) **Refuge Requirements for MON 89034 x MON 88017 Seed Blend Corn**

The following information must be included on the product bag or bag-tag:

"This product is a seed mixture containing up to 90% MON 89034 x MON 88017 and a minimum of 10% non-*Bt* seed that when planted creates an interspersed refuge within the field. The interspersed refuge can only be used by planting seed corn specifically generated by qualified seed producers/conditioners licensed by the registrant. Insecticidal treatments labeled for adult CRW control are discouraged during the time of adult CRW emergence.

The seed mix refuge option for Genuity® VT Triple PRO™ RIB Complete™ satisfies the refuge requirements in all areas other than in the cotton-growing area where corn earworm is a significant pest as defined below.

Additional refuge requirements in the cotton-growing area where corn earworm is a significant pest.

In the cotton-growing area where corn earworm is a significant pest, as defined below, Genuity® VT Triple PRO™ RIB Complete™ requires the planting of an additional 20% structured refuge (i.e. 20 acres of *non-Bt* corn for every 80 acres of Genuity® VT Triple PRO™ RIB Complete™ planted).

The 20% refuge must be planted with corn hybrids that do not contain *Bt* technologies for the control of corn rootworms or corn borers.

The 20% refuge and the Genuity® VT Triple PRO™ RIB Complete™ should be sown on the same day, or with the shortest window possible between planting dates to ensure that corn root development is similar among varieties.

The 20% refuge may be planted as an in-field or adjacent (e.g., across the road) refuge or planted as a separate block that is within ½ mile of the Genuity® VT Triple PRO™ RIB Complete™ field. In-field refuge options include blocks, perimeter strips (i.e., strips around the field), or in-field strips. If perimeter or in-field strips are implemented, the strips must be at least 4 consecutive rows wide. The refuge can be protected from lepidopteran damage by use of non-*Bt* insecticides if the population of one or more target pests of Genuity® VT Triple PRO™ RIB Complete™ in the refuge exceeds economic thresholds. In addition, the refuge can be protected from corn rootworm (CRW) damage by an appropriate seed treatment or soil insecticide; however, insecticides labeled for adult CRW control must be avoided in the refuge during the period of CRW adult emergence. Economic thresholds will be determined using methods recommended by local or regional professionals (e.g., Extension Service agents, crop consultants).

The cotton-growing area requiring the additional 20% refuge consists of the following states:

Alabama, Arkansas, Georgia, Florida, Louisiana, North Carolina, Mississippi, South Carolina, Oklahoma (only the counties of Beckham, Caddo, Comanche, Custer, Greer, Harmon, Jackson, Kay, Kiowa, Tillman, and Washita), Tennessee (only the counties of Carroll, Chester, Crockett,

Dyer, Fayette, Franklin, Gibson, Hardeman, Hardin, Haywood, Lake, Lauderdale, Lincoln, Madison, Obion, Rutherford, Shelby, and Tipton), Texas (except the counties of Carson, Dallam, Hansford, Hartley, Hutchinson, Lipscomb, Moore, Ochiltree, Roberts, and Sherman), Virginia (only the counties of Dinwiddie, Franklin City, Greensville, Isle of Wight, Northampton, Southampton, Suffolk City, Surrey, and Sussex) and Missouri (only the counties of Dunklin, New Madrid, Pemiscot, Scott, and Stoddard)."

b) **Grower Agreement for MON 89034 x MON 88017 Seed Blend Corn**

1) Monsanto must require that persons purchasing MON 89034 x MON 88017 seed blend corn sign a grower agreement. The term "grower agreement" refers to any grower purchase contract, license agreement, or similar legal document.

2) Monsanto's grower agreement and any specific stewardship documents referenced in the grower agreement must clearly set forth the terms of the current IRM program. Monsanto must write the grower agreement such that, by signing the grower agreement, a grower will be contractually bound to comply with the requirements of the IRM program.

3) Monsanto must implement a system (equivalent to that already approved for previously registered Monsanto *Bt* corn products) that is reasonably likely to assure that persons purchasing MON 89034 x MON 88017 seed blend corn will affirm annually that they are contractually bound to comply with the requirements of the IRM program. A description of the system must be submitted to EPA within 90 days from the date of registration.

4) Monsanto must use a grower agreement and must submit to EPA, within 90 days from the date of registration, a copy of that agreement and any specific stewardship documents referenced in the grower agreement. If Monsanto wishes to change any part of the grower agreement or any specific stewardship documents referenced in the grower agreement that would affect either the content of the IRM program or the legal enforceability by Monsanto of the provisions of the agreement relating to the IRM program, Monsanto must submit to EPA 30 days prior to implementing a proposed change the text of such changes to ensure that it is consistent with the terms and conditions of this registration.

5) Monsanto must implement a system (equivalent to that already approved for previously registered Monsanto *Bt* com products) that is reasonably likely to assure that persons purchasing MON 89034 x MON 88017 seed blend com sign grower agreement(s). A description of the system must be submitted to EPA within 90 days from the date of registration.

6) Monsanto shall maintain records of all MON 89034 x MON 88017 seed blend corn grower agreements for a period of three years from December 31st of the year in which the agreement was signed.

7) Monsanto must provide EPA by July 31, 2013 a preliminary report that is detailed as possible on the number of units of MON 89034 x MON 88017 seed blend corn seed shipped and not returned at the state level. Beginning on January 31, 2014 and annually thereafter, Monsanto shall submit a report on the number of units of MON 89034 x MON 88017 seed blend corn seed shipped and not returned, and the number of such units that were sold to persons who have signed grower agreements. The report shall cover the time frame of a twelve-month period.

8) Monsanto must allow a review of the grower agreements and grower agreement records by EPA or by a State pesticide regulatory agency if the State agency can demonstrate that confidential business information, including names, personal information, and grower license number, will be protected.

c) IRM Education and IRM Compliance Monitoring Program for MON 89034 x MON 88017 Seed Blend Corn

1) Monsanto must design and implement a comprehensive, ongoing IRM education program designed to convey to MON 89034 x MON 88017 seed blend com users the importance of complying with the IRM program. The education program shall involve the use of multiple media, e.g. face-to-face meetings, mailing written materials, EPA-reviewed language on IRM requirements on the bag or bag tag, and electronic communications such as by internet, radio, or television commercials. Copies of the materials will be provided to EPA for its records. The program shall involve at least one written communication annually to each MON 89034 x MON 88017 seed blend corn user separate from the grower technical guide. The communication shall inform the user of the current IRM requirements. Monsanto shall coordinate its education program with the educational efforts of other registrants and other organizations, such as the National Corn Growers Association and state extension programs.

2) Annually, Monsanto shall revise, and expand as necessary, its education program to take into account the information collected through the compliance survey and from other sources. The changes shall address aspects of grower compliance that are not sufficiently high.

3) Beginning January 31, 2014, Monsanto must provide a report to EPA summarizing the activities it carried out under its education program for the prior year. Annually thereafter, Monsanto must provide EPA any substantive changes to its grower education activities as part of the overall IRM compliance assurance program report. Monsanto must either submit a separate report or contribute to the report from the industry working group, Agricultural Biotechnology Stewardship Technical Committee (ABSTC).

4) Monsanto must submit use the existing compliance assurance program (CAP) for Monsanto's other Cry3Bb1 seed blend products.

d) Insect Resistance Monitoring and Remedial Action Plans for MON 89034 x MON 88017 Seed Blend Corn.

Existing programs for resistance monitoring and remedial action for SmartStax RIB (EPA Registration No. 524-595) are applicable and required for MON 89034 x MON 88017 seed blend corn, except for the following modified requirements.

1) The root node injury scale (NIS) triggers for unexpected damage will be 1.00 for MON 89034 x MON 88017 seed blend corn.

2) As part of the corn rootworm monitoring program for Cry3Bb1, Monsanto must utilize an on-plant assay as the diagnostic tool to detect potentially resistant individuals. Two on-plant assays have been developed and can be adopted for Cry3Bb1: Nowatzki et al. (2008) and Gassmann et al. (2011). The on-plant assay must be used beginning with the 2013 growing season. It is recommended that Monsanto consult with the Agency on the specific approach to the seedling assay prior to implementation.

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References:
Nowatzki T, Lefko SA, Binning RR, Thompson SD, Spencer TA, Siegfried BD. 2008. Validation of a novel resistance monitoring .technique for com rootworm (Coleoptera: Chrysomelidae) and event DAS-59122-7 maize. J. Appl. Entomol. 132:177- 188.

Gassmann, A.J., J.L. Petzold-Maxwell, R.S. Keweshan, and M.W. Dunbar. 2011: Field-evolved resistance to *Bt* Maize by western com rootworm. PLos One 6(7): e22629. doi: 11 0.1371/joumal.pone.0022629.

A report on results of resistance monitoring and investigations of damage reports must be submitted to the Agency annually by August 31st each year, beginning in 2014, for the duration of the conditional registration.

e) Annual Reporting Requirements for MON 89034 x MON 88017 Seed Blend Corn

Monsanto must submit to the Agency by January 31st of each year, beginning in 2014 (except where otherwise specified), the following information:

(1) Annual Sales: reported and summed by state (county level data available by request) January 31st each year, beginning with a preliminary report byJuly 31, 2013;

(2) Grower Agreements: number of units of MON 89034 x MON 88017 seed blend corn seed shipped or sold and not returned, and the number of such units that were sold to persons who have signed grower agreements;

(3) Grower Education: substantive changes to education program completed previous year;

(4) Compliance Assurance Program: compliance assurance program activities and results for the prior year and plans for the compliance assurance program for the current year;

(5) Compliance Survey Results: results of annual surveys for the prior year and survey plans for the current year;

(6) Insect Resistance Monitoring Results: results of monitoring and investigations of damage reports, by August 31st of each year, beginning in 2014.

f) Refuge Assurance Program for MON 89034 x MON Seed Blend Corn

Monsanto and Monsanto's seed company licensees must continue to implement a blended seed refuge assurance program designed to ensure MON 89034 x MON 88017 seed blend corn products are formulated with the appropriate rate of refuge seeds.

The program must include the following four elements:

1. Trait purity check on seed lots prior to blending (Monsanto and Monsanto Licensees)
2. Standard Operating Procedures for the blending process;
3. Calibration of blending equipment; and
4. Records and data retention records for seed blend products, as follows:

- Calibration records - Monsanto and Monsanto's Licensees will retain documentation for three (3) years on the equipment calibration including the procedure, when it was conducted and the results.

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• Blend proportion records (weight and kernel based) - Monsanto and Monsanto Licensees will retain documentation for three (3) years on the kernel per pound data of the components, the calculations to determine the proportions based on weight and the actual weights that are blended together to make up an MON 89034 x MON 88017 seed blend corn product by seed lot. All records must be maintained at the Monsanto and Monsanto Licensees blending facility and must be available for the EPA review upon request.

Within one year of the date of registration, Monsanto will collect documentation from qualification test runs that validate blend percentages from their licensees/conditioners that produce MON 89034 x MON 88017 seed blend corn and submit this data to the Agency. Any licensee/conditioner that is unable to verify their blend accuracy will provide evidence demonstrating application and participation in the USDA USA Accredited Seed Conditioning Program (ASCP) as outlined in ARC 1005D Appendix, http://www.ams.usda.gov/AMSv1.0/ams.fetchTemplateData.do?template=TemplateN&navID=AccreditedSeedPrograms&rightNav1=AccreditedSeedPrograms&topNav=&leftNav=&page=ASLProgram&resultType=&acct=audrevcom.

Should Monsanto or Monsanto's Licencees be notified by the USDA/AMS or State Seed Control Officials that your seed blend products have been found to have a lower percentage of the refuge component than is represented on the label, they must notify EPA within 30 days. This would constitute information reportable under FIFRA section 6(a)(2).

Monsanto must report on how many of their licensees (by number and percentage) color seed January 31st each year, beginning in 2014.

A copy of the stamped label is enclosed for your records.

Sincerely,

Keith A. Matthews, Director
Biopesticides and Pollution
Prevention Division (7511P)

Enclosure

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Plant-Incorporated Protectant Label

MON 89034 × MON 88017 RIB Complete™

Insect-Protected, Herbicide-Tolerant Corn

(Alternate Brand Name: Genuity® VT Triple PRO™ RIB Complete™)

(OECD Unique Identifier: MON-89Ø34-3 × MON 88Ø17-3)

Active Ingredients:

Bacillus thuringiensis Cry1A.105 protein and the genetic material necessary for its production (Vector PV-ZMIR245) in event MON 89034 corn (OECD Unique Identifier: MON-89Ø34-3) ..... ≤0.0024%*

Bacillus thuringiensis Cry2Ab2 protein and the genetic material necessary for its production (Vector PV-ZMIR245) in event MON 89034 corn (OECD Unique Identifier: MON-89Ø34-3) ..... ≤0.0057%*

Bacillus thuringiensis Cry3Bb1 protein and the genetic material necessary for its production (Vector PV-ZMIR39) in event MON 88017 corn (OECD Unique Identifier: MON-88Ø17-3) ..... ≤0.0070%*

Other Ingredients:

CP4 EPSPS protein (5-enolpyruvylshikimate-3-phosphate synthase) and the genetic material necessary for its production (Vector PV-ZMIR39) in event MON 88017 corn (OECD Unique Identifier: MON-88Ø17-3) ..... ≤0.0069%*

*Percentage (wt/wt) on a dry weight basis whole plant (forage)

‡ Genuity® VT Triple PRO™ RIB Complete™ seed with this refuge configuration contains up to 90% MON 89034 × MON 88017 mixed with at least 10% non-*Bt* corn within a single lot of seed.

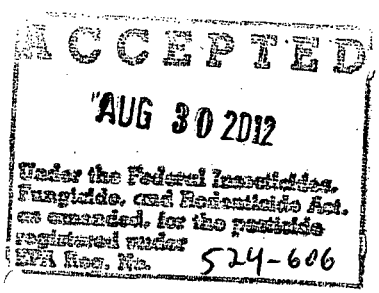
KEEP OUT OF REACH OF CHILDREN

Caution

NET CONTENTS_____

EPA Registration No. 524-606
EPA Establishment No. 524-MO-002

Monsanto Company
800 North Lindbergh Blvd.
St Louis, MO 63167



® Genuity is a registered trademark of Monsanto Technology LLC.

™ VT Triple PRO and RIB Complete are trademarks of Monsanto Technology LLC.

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. This product must be used as specified in the terms and conditions of the registration.

MON 89034 × MON 88017 RIB Complete™ protects corn crops from leaf, stalk, and ear damage caused by lepidopteran corn pests listed on this label and root damage caused by corn rootworm larvae listed on this label. In order to minimize the risk of these pests developing resistance to MON 89034 × MON 88017 RIB Complete™ corn, an insect resistance management plan must be implemented as defined in the registration terms and conditions.

Grower agreements will specify that growers must adhere to the refuge requirements that will be described on the bag or bag-tag for MON 89034 × MON 88017 RIB Complete™ corn or other applicable product use documents.

Sales of corn hybrids that contain Monsanto's *Bt* corn plant-incorporated protectants must be accompanied by information on planting, production, and insect resistance management. This information may appear on either an IRM/Grower Guide or on the corn seed bag or bag tag.

Corn seed bags or bag tags for products containing MON 89034 × MON 88017 RIB Complete™ must include the refuge requirement.

INSECT RESISTANCE MANAGEMENT

Growers are instructed to read information on insect resistance management in the IRM Grower Guide or the bag or bag-tag.

The seed producer must ensure a minimum of 10% non-*Bt* refuge seed is included with the MON 89034 × MON 88017 in each lot of seed corn.

The IRM Grower Guide for MON 89034 × MON 88017 RIB Complete™, and comparable information presented on the product bag or bag-tag, must contain the following information:

This product is a seed mixture containing up to 90% MON 89034 × MON 88017 and a minimum of 10% non-*Bt* seed that when planted creates an interspersed refuge within the field. The interspersed refuge can only be used by planting seed corn specifically generated by qualified seed producers/conditioners licensed by the registrant.

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The seed mix refuge option for Genuity® VT Triple PRO™ RIB Complete™ satisfies the refuge requirements in all areas other than in the cotton-growing area where corn earworm is a significant pest as defined below.

Additional refuge requirements in the cotton-growing area where corn earworm is a significant pest

In the cotton-growing area where corn earworm is a significant pest, as defined below, Genuity® VT Triple PRO™ RIB Complete™ requires the planting of an additional 20% structured refuge (i.e. 20 acres of non-*Bt* corn for every 80 acres of Genuity® VT Triple PRO™ RIB Complete™ planted).

The 20% refuge must be planted with corn hybrids that do not contain *Bt* technologies for the control of corn rootworms or corn borers.

The 20% refuge and the Genuity® VT Triple PRO™ RIB Complete™should be sown on the same day, or with the shortest window possible between planting dates to ensure that corn root development is similar among varieties.

The 20% refuge may be planted as an in-field or adjacent (e.g., across the road) refuge or planted as a separate block that is within ½ mile of the Genuity® VT Triple PRO™ RIB Complete™ field. In-field refuge options include blocks, perimeter strips (i.e., strips around the field), or in-field strips. If perimeter or in-field strips are implemented, the strips must be at least 4 consecutive rows wide. The refuge can be protected from lepidopteran damage by use of non-*Bt* insecticides if the population of one or more target pests of Genuity® VT Triple PRO™ RIB Complete™ in the refuge exceeds economic thresholds. In addition, the refuge can be protected from CRW damage by an appropriate seed treatment or soil insecticide; however, insecticides labeled for adult CRW control must be avoided in the refuge during the period of CRW adult emergence. Economic thresholds will be determined using methods recommended by local or regional professionals (e.g., Extension Service agents, crop consultants).

The cotton-growing area requiring the additional 20% refuge consists of the following states: Alabama, Arkansas, Georgia, Florida, Louisiana, North Carolina, Mississippi, South Carolina, Oklahoma (only the counties of Beckham, Caddo, Comanche, Custer, Greer, Harmon, Jackson, Kay, Kiowa, Tillman, and Washita), Tennessee (only the counties of Carroll, Chester, Crockett, Dyer, Fayette, Franklin, Gibson, Hardeman, Hardin, Haywood, Lake, Lauderdale, Lincoln, Madison, Obion, Rutherford, Shelby, and Tipton), Texas (except the counties of Carson, Dallam, Hansford, Hartley, Hutchinson, Lipscomb, Moore, Ochiltree, Roberts, and Sherman), Virginia (only the counties of Dinwiddie, Franklin City, Greensville, Isle of Wight, Northampton, Southampton, Suffolk City, Surrey, and Sussex) and Missouri (only the counties of Dunklin, New Madrid, Pemiscot, Scott, and Stoddard).

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Corn Insects Controlled

European corn borer (ECB)	*Ostrinia nubilalis*
Southwestern corn borer (SWCB)	*Diatraea grandiosella*
Southern cornstalk borer (SCSB)	*Diatraea crambidoides*
Corn earworm (CEW)	*Helicoverpa zea*
Fall armyworm (FAW)	*Spodoptera frugiperda*
Stalk borer	*Papaipema nebris*
Lesser corn stalk borer	*Elasmopalpus lignosellus*
Sugarcane borer (SCB)	*Diatraea saccharalis*
Western corn rootworm (WCRW)	*Diabrotica virgifera virgifera*
Northern corn rootworm (NCRW)	*Diabrotica barberi*
Mexican corn rootworm (MCRW)	*Diabrotica virgifera zeae*

Genuity® VT Triple PRO™ RIB Complete™ is a product of Monsanto's and Dow AgroSciences' research programs, offering unique genetic characteristics for specific grower needs and may be protected by one or more of the following U.S. patents: 5378619, 5424412, 5554798, 5641876, 5717084, 5728925, 6025545, 6051753, 6063597, 6083878, 6489542, 6645497, 6713063, 6962705, 7064249, 7070982, 7250501, 7304206, 7544862, 7618942, 7700830, 7927598, 8034997, and RE39247.

EPA Accepted: __/__/__