

5481-218

7/2/2008

Page 185



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jon C. Wood
Amvac Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660

JUL 2 2008

SUBJECT: Application for Alternate Source of Supply
Confidential Statement of Formula (CSF); Revised Label
1-Napthalene Acetic Acid Sodium Salt
EPA Reg. No. 5481-218
Your Submission Dated February 22, 2008

Dear Mr. Wood:

The Agency has reviewed the above mentioned application for an additional source of active ingredient and revised label (96.22%) and the findings are as follows:

1. The product chemistry data submitted for 830 series group A which included the guidelines 830.1550, 830.1600, 830.1700, 830.1750 and 830.1800 are acceptable and support the proposed CSF (05-05-08).
2. The proposed basic CSF (dated 05-05-08) is acceptable and will supersede the current basic CSF dated 02/17/88.
3. There are three new impurities identified in the technical produced in India. The registrant has given a certified statement dated May 7, 2008 that new impurities are not considered to be toxicologically significant.
4. The revised label, now showing the AI as 96.22% is acceptable.

If you have any questions regarding this submission, contact Rose Kearns of my staff at 703-305-5611 or myself at 703-308-3194.

Sincerely,

A handwritten signature in cursive script that reads "Shaja Joyner". The signature is written in dark ink and is positioned above the printed name and title.

Shaja Joyner
Product Manager
Fungicide Branch
Registration Division (7505P)

Enclosure: Label stamped Acceptable

3 8 5

1-NAPHTHALENEACETIC ACID SODIUM SALT

This Product Is For Reformulation Into Products Intended As
Plant Growth Regulators On Apples And Pears
And Only For Those Uses Which Are Duly Registered With The
U.S. Environmental Protection Agency

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid Sodium Salt.....96.22%

INERT INGREDIENTS3.88%

TOTAL:100.0%

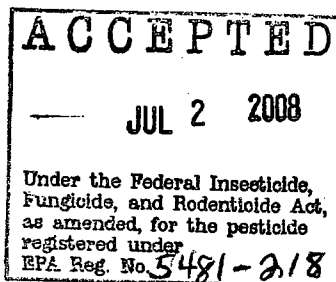
KEEP OUT OF REACH OF CHILDREN

WARNING

Si usted no entiende la etiqueta, busque a alguien Para que se la explique a usted en detalle.
(If you do not understand this label, find someone to explain it to you in detail.)

| FIRST AID | |
|---|---|
| If swallowed: | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice • Have a person sip a glass of water if able to swallow • Do not induce vomiting unless told to do so by a poison control center or doctor • Do not give anything by mouth to an unconscious person. |
| 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 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 in eyes: | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye • Call a poison control center or doctor for treatment advice. |
| EMERGENCY INFORMATION | |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY: Transportation: CHEMTREC.....1-800-424-9300 Other: AMVAC.....1-323-264-3910 | |

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE
EPA Reg, No, 5481-218
EPA Est. No. 54842-KR-3



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury Harmful if inhaled swallowed or absorbed through the skin. Avoid contact with skin, eyes, and clothing. Wear safety goggles when handling Wash thoroughly after handling and before eating or smoking

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority For guidance, contact our State Water Board or Regional Office of the EPA Do not contaminate water when disposing of equipment wastewaters.

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL. Use strictly in accordance with PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.
FOR MANUFACTURING, REFORMULATING, OR COMPOUNDING USE ONLY.

This product is for reformulation into products intended as Plant Growth Regulators on Apples and Pears and only for those uses which are duly registered with the U. S. Environmental Protection Agency. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited

STORAGE: Store product in original container in a cool, dry, locked place out of direct sunlight. Do not store or transport near feed or food.

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: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles Empty residue into formulation equipment Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED, IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

Amvac Chemical Corporation
4100 E Washington Blvd.
Los Angeles, CA 90023 USA.
1-323 264-3910 www.amvac-chemical.com