

5481-350

97-13-2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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AMVAC
4695 MacArthur Court
Suite 1250
Newport Beach, CA 92660

JUL 13 2010

Subject: METAM SODIUM
EPA Reg. No. 5481-350
Metam Alliance's Request on Your Behalf to Amend Label

Dear Mr. Chart:

In the Agency letter of April 30, 2010, the Agency approved amended labeling for this registration with the condition that specific label revisions be made to the April 30, 2010 label stamped "Accepted with Comments". This letter further amends the April 30, 2010 letter by revising the label comments and by requiring additional changes.

1. (Label p.3) (Alliance issue # 1)
At the end of the "Directions for Use" section add the following sentence: "Do not apply when wind speed favors drift beyond the area intended for treatment."
2. (Label p.3) (EPA comment 3-b) (Alliance issue #17)
Replace EPA's comment with this text:
 - In the "User Safety Requirements" section, add the following sentences: "DO NOT transport contaminated clothing inside a closed vehicle unless stored in a sealed container. Wash or dispose as specified."
3. (Label p.3) (EPA Comment 3-e) (Alliance issue # 3)
Disregard EPA's comment to add additional California restrictions back on the label.
4. (Label p.5) (EPA Comment 5-b) (Alliance issue #7)
Replace EPA's comment with this text:
 - At the end of the "Protection for Handlers" section, add the following sentence: "Cartridges or canisters must be replaced when odor or irritation from this product becomes apparent, if the measured concentration of MITC is greater than 6000 ppb, or after 8 hours of use, whichever occurs first."

5. (EPA comment 8-h) (Alliance issue # 18)
Disregard EPA's comment regarding the words "or more."
6. (Label p.16) (EPA Comment 8-o) (Alliance issue # 8)
Replace EPA's comment with this text:
 - In the wind speed section of the "Center Pivot" section, replace the first two bullets with the following:
 - For sprinkler or **center pivot** applications: 1) not using a solid stream type nozzle, OR 2) having a release height or spray height greater than 4 feet, OR 3) having 30 lbs or greater PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 10 mph.
 - For sprinkler or **center pivot** applications using 1) a solid stream, AND 2) having release height and spray height less than 4 feet, AND 3) having 29 lbs. or less PSI at the sprinkler head, wind speed at the application site must be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 25 mph.
7. (EPA comment 8-r) (Alliance issue # 9)
Disregard EPA's comment about air temperature.
8. (Label p.25) (Alliance issue # 42)
Add the following to the "Application and Equipment Considerations" section of the GAP for Drip Application method:
 - "Nozzles and metering devices are of correct size and are sealed and unobstructed."
9. (Label p.37) (EPA comment 16-b) (Alliance issue # 26)
In comment 16-b, replace "37.5 to 75 gallons per treated acre" with "**40-100 gallons per treated acre.**"
10. (EPA comment 17-a) (Alliance issue # 19A)
Disregard EPA's comment about the tobacco tarp method.
11. (Label p. 35) (Alliance issue # 32)
Directly above the "Sprinkler Chemigation Systems" section, add: "Any alternatives to the required safety devices in this label must conform to the list of EPA-approved alternative devices."
12. (Label p.37) (Alliance issue # 33)
Delete all cross references to the former "General Precautions for Irrigation Systems" section.
13. (Label p.40)
Verify that the warranty and disclaimer language is up to date. See the link below for further information.

<http://www.epa.gov/oppfead1/labeling/lrm/chap-12.htm#IX>

The label associated with these changes has been previously stamped "Accepted with Comments" and is dated April 30, 2010. Submit one copy of the final printed label that incorporates the required changes before the product is released for shipment. If you have any questions, please contact Cathryn O'Connell by phone at (703) 308-0136 or via email at occonnell.cathryn@epa.gov or Erik Kraft by phone at (703)308-9358 or via email at kraft.erik@epa.gov.

Sincerely,



Erik Kraft
Acting Product Manager (20)
Fungicide Branch
Registration Division (7504P)