



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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Suite 1250
Newport Beach, CA 92660

JUL 15 2010

Subject: Metam 376
EPA Reg. No. 5481-458
Metam Alliance's Request on Your Behalf to Amend Label

Dear Mr. Chart:

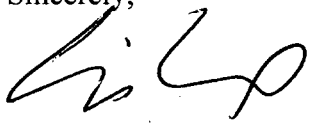
In the Agency letter of April 30, 2010, the Agency approved amended labeling for this registration with the condition that specific label revisions be made to the April 30, 2010 label stamped "Accepted with Comments". This letter further amends the April 30, 2010 letter by revising the label comments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

1. (EPA Comment 1-a) Replace comment 1-a with the following text:
 - All water-run application methods **must** be removed except for drip.
2. (Label p.3) (EPA Comment 4-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 4-c and 4-e) (Alliance issue # 1)
Replace EPA's comment 4-c with this text:
 - Add the following sentence at the end of the first paragraph in the "Environmental Hazards" section: "Do not apply when wind speed favors drift beyond the area intended for treatment."
Replace comment 4-e with this text:
 - 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."

4. (Label p.3) (EPA Comment 4-f) (Alliance issue # 3)
Disregard EPA's comment to add additional California restrictions back on the label.
5. (Label p.5) (EPA Comment 6-c) (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."
6. (EPA Comment 9-h) (Alliance issue # 9)
Disregard EPA's comment about air temperature.
7. (Label p.23) (Alliance issue # 12)
Revise the first paragraph under "Soil Conditions" to read as follows:
 - "Soil must be in good tilth and free of large clods. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone, tillage to fracture these layers must occur. The soil must be tilled prior to the application, at a minimum to the depth of the treatment zone."
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 pages 32 and 33) (Alliance issue # 32)
In the "Observe the Following Precautions...Public Water System" section, revise the text as follows:
 - Any alternatives to the above required safety devices in this label must conform to the list of EPA-approved alternative devices.
10. (Label pages 34 and 35)
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
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