



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: AMC 540™
EPA Reg. No. 5481-483
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) (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."
2. (Label p.3) (EPA Comment 3-e) (Alliance issue # 1)
Replace EPA's comment with this text:
To the "Directions for Use" section, add the following text: "Do not apply when wind speed favors drift beyond the area intended for treatment."
3. (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."
4. (EPA Comment 8-g) (Alliance issue # 9)

Disregard EPA's comment about air temperature.

5. (Label p.16) (EPA Comment 8-k) (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.

6. (Label p.31) (EPA Comment 11-a) (Alliance issue # 14)

The maximum application rate must be changed to read,

- "Maximum Application Rate is **360** lbs ai/A. (**62** gallons per treated acre)."

7. (Multiple label pages) (EPA Comment 12)

Replace EPA's comment with this text:

- Maximum application rates - All other places on the label that state applications may be made up to 60 gallons per acre must be changed to not allow any applications at rates higher than **62** gallons per acre. All rates, including those provided in linear feet, must be checked to not exceed the maximum allowed.

8. (Label p.38) (Alliance issue # 26)

Add the following sentences to the "Check Flood (Basin) Furrow and Border" section:

"Meter AMV540 at a steady rate into water during irrigation. Depending on the kind of pest and the treatment depth, use 30-62 gallons per treated acre in 3 to 18 inches of water per acre. Meter AMV540 into the irrigation water at the head of the field at a point with enough turbulence to assure adequate mixing of the product in the water."

9. (Label pages 38 and 45) (Alliance issue # 33)

Delete all cross references to the former "General Precautions for Irrigation Systems" section.

10. (EPA Comment 23) (Alliance issue # 19A)

Disregard EPA's comment about the tobacco tarp method.

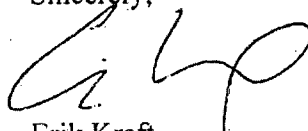
11. (Label pages 48 and 49)

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)
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