

19713-31

03/07/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Luz G. Chan
Drexel Chemical Company
1700 Channel Av.
P.O. Box 13327
Memphis, TN 38113-0327

MAR -7 2007

Dear Ms. Chan:

Subject: Label Amendment
Propanil 4L
EPA Reg. No. 19713-31
Submission dated December 19, 2006

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following changes:

The labeling, referred to above, submitted in connection with the application under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the following changes:

3. Under "First Aid";

Interchange the sequence between "If in Eyes" and "If Swallowed" treatments since the product causes severe eye irritation.

4. Under "Personal Protective Equipment";

Add the following requirements for formulations not packed with a built-in probe:

Some materials that are chemical-resistant to this product are [registrant inserts correct material]. For more information, follow instruction in Supplement Three of PR-Notice 93-7. If you want more options, follow the instructions for category [insert A, B, C, D, E, F, G, or H] on EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, and other handlers must wear the following:

- Long-sleeved shirt,
- Long pants,
- Shoes plus socks, chemical resistant footwear must be worn when cleaning up spills or equipment.
- Chemical-resistant gloves, and chemical-resistant apron when mixing/loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

See engineering controls for additional requirements.

6. "Under Method of Applications – By Air";

Add the following statements on "Information on drop size":

The most effective way to reduce drift potential is apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control.

7. Add instructions for preparing spray mixtures.

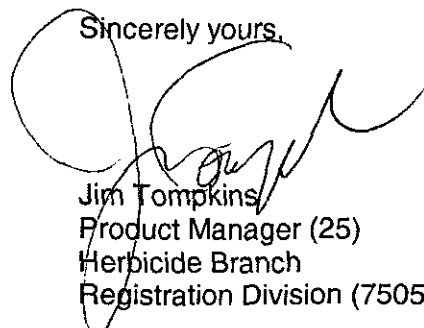
8. "Under Spray Drift Management";

Add the aerial drift reduction advisory information specified in the EPA Reregistration Eligibility Decision (RED) for Propanil. The requirements are listed from page 113 to 115 of the RED document (from Information on Drop Size to Sensitive Areas).

The amended label supersedes all previously accepted labels. A stamped copy of the revised label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment.

The proposed basic and alternative CSFs are acceptable. The new basic CSF replaces the previously accepted one. The new basic and alternate CSFs will be kept in our file for this product.

Sincerely yours,



Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505P)

Enclosure

CONCURRENCES								
SYMBOL >	7505P	7505P						
SURNAME >	Bien	Tompkins						
DATE >	02-08-07							



Drexel

Prop-Job 4

Propanil Herbicide

For Post Emergence Control of Barnyardgrass and Other Weeds in Rice.

ACTIVE INGREDIENT:

Propanil 43.5%

OTHER INGREDIENTS: 56.5%

TOTAL: 100.0%

This product contains 4 pounds of propanil active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN WARNING/AVISO

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

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-31

EPA Est. No. 19713-MS-1

Net Contents _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not give anything by mouth to an unconscious or convulsing person.
- Do not induce vomiting unless told to do so by a poison control center or doctor.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of soap and water for 15 to 20 minutes.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

Note to Physician: May cause chemical pneumonitis if aspirated. If lavage is performed, suggest endotracheal and/or esophagoscopy control.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: May be fatal if swallowed. Causes severe eye irritation. May cause skin irritation. Do not breathe spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

(Continued)

PRECAUTIONARY STATEMENTS (Con't.)

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are any waterproof material listed below. For more information, follow instructions in Supplement Three of PR Notice 93-7. If you want more options, follow the instructions for category B on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, and other handlers must wear the following, except when removing an unrinsed probe: Long-sleeved shirt and long pants, chemical-resistant gloves, and chemical-resistant apron when mixing/loading, cleaning up spills or equipment, or otherwise exposed to the concentrate, and shoes plus socks. In addition, handlers must wear chemical resistant footwear when cleaning up spills or equipment.

Mixers, loaders, and other handlers must wear the following when removing an unrinsed probe:

- coverall over long-sleeved shirt and long pants,
- chemical resistant gloves,
- chemical resistant footwear plus socks,
- protective eyewear if the system operates under pressure, and
- chemical resistant apron.

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

ENGINEERING CONTROLS

Mixers and loaders must either:

1. Use a closed system that meets the requirements listed in the Worker Protection Standard (WPS) for dermal protection of agricultural pesticides [40 CFR 170.240(d)(4)], OR,
2. Use the probe system described below.

Probe System

Specific requirements for use of the probe closed mixing/loading system:

- Remove plug from bung of drum containing this product only when drum is sitting on the ground or on a secure level platform, with the bung end of the drum pointed up.
- Do not pour this product from its drum.
- Transfer product from the drum to the mixing tank by use of a suction hose connected at one end to the suction pump on the mixing tank and connected at the other end to a probe (dip tube) that is inserted through the bung opening into the drum.
- Do not handle the probe or bung in a manner that allows dripping or splattering of the product onto yourself or any other person.
- Do not touch the portion of the probe that has been in contact with this product until after the probe has been triple rinsed with water.
- If all of the product is removed from the drum, then triple rinse the probe while it remains inside the drum.

Unrinsed Probes

- If an unrinsed probe must be removed from the drum, then use an anti-drip flange, and immediately transfer the probe into a container of rinse water. The anti-drip flange must be designed to remove excess propanil product from the probe as it is extracted from the drum.
- Take the following steps if the probe must be disconnected from the suction hose before both the probe and the hose have been triple rinsed:
 - equip the probe end of the hose with a shut-off valve,
 - install a dry break coupling between the valve and the probe,
 - close the shut-off valve before disconnecting the probe.

(Continued)

Manufactured By:
Drexel Chemical Company
 P.O. BOX 9306, MEMPHIS, TN 38190-0306
 SINCE 1972

ENGINEERING CONTROLS (Co)

All Transfer Systems

In addition, mixers and loaders using all systems must:

- Wear the personal protective equipment required in the PPE section of this labeling for mixers and loaders.
- Wear protective eyewear, if the system operates under pressure, and
- When using a system that meets the requirements in the WPS as a closed system or using a probe system when the probe is not removed, chemical-resistant footwear must be provided, be immediately available, and be used in an emergency, such as a broken package, spill, or equipment breakdown.

All systems must be capable of removing the pesticide from the shipping container and transferring it into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage.

Human flagging is prohibited. Flagging to support aerial application is limited to use of the Global Positioning System (GPS) or mechanical flaggers.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical prior to flooding may result in some shallow ground water contamination due to cracks in subsoil of the Rice paddy.

This product may contaminate water through runoff following rainfall events and by seepage through levees. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours. Levees should be constructed with adequate time prior to chemical application so that they are compacted to reduce seepage and to hold a 3 to 6 inch flood.

GENERAL INFORMATION

PROP-JOB 4 is a postemergent herbicide used for the control of many grasses and broadleaved weeds in Rice fields. This product acts only on grasses and weeds which have already germinated. This product is not hormone-type but kills susceptible plants by direct contact action. For this reason, thorough spray coverage of weeds to be controlled is necessary for best results.

DIRECTIONS FOR

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

DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not apply when weather conditions favor drift from target area.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE), and restricted-entry interval (REI). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the REI of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: Coveralls, chemical-resistant footwear plus socks, chemical-resistant gloves made of any waterproof material, and protective eyewear.

USE RECOMMENDATIONS:

DO NOT use this product until you have read the entire label.

This product should be applied when weeds are small. Rice fields to be treated should be inspected frequently before application of this product to ensure that most grasses have reached 1 to 3-leaf stage.

Rice fields should be well prepared and free of large clods to obtain uniform germination of weeds and to ensure uniform flood level. If necessary, fields may be flushed prior to treatment to produce uniform weed germination and growth. Water should be drained from fields prior to spraying so that weeds are fully exposed to the spray.

To prevent more weeds from germinating after treatment, Rice fields should be flooded within 24 hours after spraying or as soon as possible after 24 hours. Flooding after spraying will improve grass control after application of this product.

In cases where flooding of the field would not be completed within 7 days or less after application of this product, it is best to treat a portion of the field, flood that treated portion, and then treat the remainder. Higher rates (4 to 6 qts./A) may be necessary on the remainder since the weeds will be more mature.

METHOD OF APPLICATIONS:

This product may be applied either by GROUND or AERIAL spray equipment.

By Ground: Use approximately 20 to 30 gallons of carrier per acre at high enough pressure.

By Air: Use approximately 10 gallons of carrier per acre.

Ensure that the spray equipment is properly calibrated before applying this product to avoid under and over application.

WEATHER CONDITIONS:

Temperature: Temperatures at and before application affect product activity in controlling target weeds. Applications should be made when daily maximum temperatures are between 75°F and 100°F. Control decreases with temperatures below 75° and increases with temperatures above 75°F.

Application Timing: This product normally requires 8 hours of direct sunlight after application for absorption into target weeds; however, many atmospheric and environmental conditions can affect absorption into the target weeds. It is highly recommended that application of product be planned so that the applied product remain in contact with the leaf surfaces for at least 48 hours prior to rainfall or flooding. Historically, morning applications of propanil herbicide, including this product, have produced better results in weed control.

Relative Humidity: This product is a contact herbicide; therefore herbicidal activity is affected by humidity. High humidity and dew aid in weed control by allowing the product to remain in solution longer on the leaf surface. Low humidity decreases plant activity and thus reduces product absorption. During periods of very low humidity, higher spray volumes, 8 to 10 gallons per acre, should be used when applied aerially.

Soil Moisture: Under dry conditions grass and broadleaf weeds are less susceptible to control. Higher rates of this product, up to 6 quarts per acre, should be used to achieve control.

Wind: Avoid application if wind velocity is high enough to cause drift of the application spray off the target site or irregular spray patterns.

Weeds Controlled

Common Name	Scientific Name
Barnyardgrass (Watergrass)	<i>Echinochloa crusgalli</i> or <i>Echinochloa colonum</i>
Alligator Weed	<i>Alternanthera philoxeroides</i>
Brachiaria	<i>Brachiaria</i> spp.
Crabgrass	<i>Digitaria sanguinalis</i>
Croton	<i>Croton capitatus</i>
Curley Indigo	<i>Aeschynomene virginica</i>
Foxtail	<i>Setaria</i> spp.
Goosegrass	<i>Eleusine indica</i>
Gulf Cockspur	<i>Echinochloa crus-payonis</i>
Hoorahgrass	<i>Fimbristylis miliaceae</i>
Mexican Weed	<i>Cyperonia palustris</i>
Paragrass	<i>Panicum pupurascens</i>
Pigweed	<i>Amaranthus retroflexus</i>
Redweed (Teaweed)	<i>Melochia corchorifolia</i>
Sour Dock	<i>Rumex crispus</i>
Spearhead	<i>Rhynchospora comiculata</i>
Tall Indigo or Coffee Bean	<i>Sesbania exaltata</i>
Texas Millet	<i>Panicum texanum</i>
Wiregrass	<i>Eleocharis</i> spp.

Weeds Not Controlled

Common Name	Scientific Name
Arrowhead	<i>Sagittaria</i> spp.
Bermudagrass	<i>Cynodon dactylon</i>
Cattail	<i>Typha latifolia</i>
Ducksalad	<i>Heteranthera</i> spp.
Johnsongrass	<i>Sorghum halepense</i>
Nutgrass	<i>Cyperus</i> spp.
Red Rice	<i>Oryza sativa</i>
Sprangletop	<i>Leptochloa</i> spp.

SPRAY DRIFT MANAGEMENT:

Avoiding spray drift at the application site is the responsibility of the applicator and the grower. The interactions of many equipment and weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only when the wind speed is less than or equal to 10 mph at the application site.

Apply as a medium or coarser spray (ASAE standard 572).

Additional requirements for ground applications

Apply using a nozzle height of no more than 4 feet above the ground or crop canopy.

Additional requirements for aerial applications

Do not apply by air if drift can occur to sensitive nontarget crops or plants that are within 100 feet of the application site.

Do not release spray at a height greater than 10 feet above the ground or crop canopy.

The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.

Do not make any type of application into temperature inversions.

When applications are made with a cross-wind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of the application area by adjusting the path of the aircraft upwind.

ADJUVANTS AND APPLICATION AIDS

When this product is used alone (not in combination with any other postemergent Rice herbicide), a low viscosity crop oil concentrate or surfactant may be used to improve wetting of foliage and increase weed control. Use of a crop oil concentrate is recommended when application is made during cool weather conditions or unstable weather conditions that may produce rain. Under adverse weather conditions, the addition of a crop oil concentrate when tank mixing this product and other Rice herbicides for application should be considered. Consult product labels for adjuvant recommendations. The use of a suitable crop oil concentrate or surfactant does not significantly increase injury to Rice (leaf tip burn.)

Consult Extension Service for detailed application advice.

PLANT BACK INTERVAL

Do not plant or transplant crops in the treated area for at least 60 days following an application of this product.

RECOMMENDED RATES:

Weed Stage	Amount of this Product Per Acre (qts.)
1- to 3-leaf stage	3
4- to 6-leaf stage	4 to 6*

*Use 4 to 6 quarts of this product when unseasonably cool weather conditions prevail, when grass and broadleaved weeds are stressed due to dry conditions, or in cases where Rice field has not been drained completely and weeds are large enough.

Note: Application of this product after the 4-leaf stage may cause visible injury under some climatic conditions but Rice plants usually outgrow such injury.

USE IN CALIFORNIA ONLY

In California, use this product only where Rice fields are not completely drained.

Note: Read entire label before using this product.

To control watergrass, apply this product 30 to 45 days after planting, before Rice is fully tillered, when watergrass extends 6 to 8 inches above water surface. If Rice has a deep flood, water level may be lowered to 3 to 4 inches over highest part of field to expose 6 to 8 inches of watergrass. (When lowering water level, do so slowly to avoid pulling down Rice plants). Use 5.33 quarts per acre if most grass has developed 3 to 5 leaves, use 6.66 quarts if most grass has 5 to 6 leaves, and use 8 quarts per acre if most grass has 7 or more leaves. Apply in no less than 10 to 12 gallons of water, using a medium-fine spray.

If higher water level is desired after treating, re-flooding may be started 12 hours after treatment.

USE PRECAUTIONS AND RESTRICTIONS

Do not apply more than 6 lbs. active ingredient (6 quarts of this product) per acre per application. Do not apply more than 8 lbs. active ingredient (8 quarts of this product) per acre per season.

Application to fields where catfish farming is practiced and draining water from fields into areas where catfish farming is practiced is prohibited.

Do not harvest Rice within 60 days of application.

Water drained from treated Rice fields MUST NOT be used to irrigate other crops or released within 2 miles upstream of a potable water intake in flowing water (eg. river, stream, etc.) or within 2 miles of a potable water intake in a standing body of water such as a lake, pond, or reservoir.

Do not apply this product within 14 days before or after an insecticide application or serious damage to Rice may occur.

Do not apply to any crop other than Rice.

Allow 60 days interval prior to planting any rotational crops in areas treated with this product.

Do not apply this product under wind conditions which allow drift to adjacent susceptible crops such as Beans, Soybeans, Cotton, Safflower, Cucurbits, Vegetables, Orchards and other sensitive crops.

EMERGENCY RELEASE PROVISION

Water holding (discharge) intervals for flood water following propanil application in all States:

For delayed flood (water-seeded) Rice grown south of Interstate Highway 10 from the Texas/Louisiana border to Houston and east of State Highway 35 from Houston to Port Lavaca - Flood water must be held for 10 days after application, unless excessive rainfall completely submerges the Rice crop and forces premature release. For Texas Rice grown in areas North or West of these boundaries, the water holding interval will be 7 days.

For delayed flood (water-seeded) Rice in Southern Louisiana south of Highway 14 - Flood water must be held for 15 days after propanil application unless excessive rainfall completely submerges the Rice crop and forces premature release. Delayed flood (water-seeded) Rice in Louisiana, North of the Highway 14 boundary, is subject to the 7-day water holding interval provisions.

For permanent flood (water-seeded) Rice in California and all other parts of the US not mentioned above - Flood water must be held for 7 days after application, unless excessive rainfall completely submerges the Rice crop and forces premature release.

SPRAYER CLEANUP

Before using equipment exposed to this product to treat another crop, clean the sprayer and any other equipment (loading hoses, batch tanks, etc.) using the following procedure:

1. Steam-clean tank using a non-chlorine-based detergent, taking care to remove all physical residues.
2. Thoroughly rinse sprayer, tanks, boom, and hoses with clean water (free of sediment and agricultural chemicals.)
3. Fill the tank one-half full with clean water and add Nutra-sol at 32 ounces per 100 gallons of water. Fill the tank to capacity with clean water. Flush the nozzles, boom, and hoses, and agitate (and recirculate, if possible) the sprayer for 15 minutes. Drain the equipment, taking care to flush the boom and hoses thoroughly.
4. Rinse tanks, hoses and nozzles with clean water to remove 'Nutra-sol'.
5. Fill the tank one-half full with clean water and add 1 gallon of 21% ammonia or 7 gallons of 3% ammonia per 100 gallons of water. Fill the tank to capacity with clean water. Flush the nozzles, boom, and hoses and agitate (and recirculate, if possible) the sprayer for 15 minutes. Drain the equipment, taking care to flush the boom and hoses thoroughly.
6. Remove nozzles, screens, and strainers, and clean them separately.
7. Rinse tanks, booms, and hoses with clean water.
8. Repeat steps 5 and 7 an additional 3 times.
9. Rinse tanks, booms, and hoses to remove all traces of ammonia.
10. Water rinses may be applied to Rice fields. Dispose of bleach rinses at an approved waste disposal facility.

Note: When applying multiple loads of this product several days in a row, the following procedure must be performed at the end of each day; partially fill the tank with fresh water, flush the boom and hoses, and allow to sit overnight.

ATTENTION: Do not use chlorine bleach with ammonia. All traces of liquid fertilizer containing ammonia, ammonium nitrate or ammonium sulphate must be rinsed from the mixing and application equipment using water before adding chlorine bleach solution. Failure to do so will release a gas with a musty chlorine odor that can cause eye, nose, throat and lung irritation. Do not clean equipment in an enclosed area.

Perform cleanup procedures on batch tanks and any other mixing equipment separately from aircraft hoppers. Take care to clean loading hoses and any other equipment or surfaces exposed to this product.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. **PESTICIDE STORAGE:** Storage should be under lock and key and secure from access by unauthorized persons and children. Do not store near open flame. Storage should be in a cool dry area away from any heat or ignition source. Avoid high temperatures. This product is incompatible with strongly acid or alkaline solutions. Do not stack over 2 pallets high. Move containers by handies. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original container only. If the contents are leaking or material is spilled follow these steps:

1. Eliminate ignition source.
2. Contain spill, absorb with material such as saw dust, clay granules or dirt.
3. Collect and place in suitable containers for disposal.
4. Wash area with water and soap to remove remaining pesticide.
5. Follow washing with clean water rinse.
6. Do not allow run off to enter sewer or contaminate water supplies.
7. Dispose of waste as indicated below:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Metal Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Plastic Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY—CONDITIONS OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed to be reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the fullest extent permitted by law, in no case shall Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. To the fullest extent permitted by law, the foregoing is a condition of sale by Manufacturer and is accepted as such by the Buyer.

6/6
ACCEPTED
with COMMENTS
in EPA Letter Dated

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

19713-31

MAR 7 2007