

33270-11

04-09-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 9 2010

James A. Heavens
Manager, Nutrimax Products
United Suppliers, Inc.
30743 260th Street, Box 538
Eldora, IA 50627

Re: **Registration Review** for Green Label
EPA Registration 33270-11
Decision Number 405726
Response to EPA/SRRD Email Dated 12/11/08

Dear Mr. Heavens:

The Agency is in receipt of your revised label submitted January 19, 2009, and has confirmed the specified language with respect to the baling of hay has been added as requested. As previously noted, this change ensures negligible environmental exposure, and therefore, allows the Agency to proceed with a final registration review decision without data call in for the following:

850.4100	Seedling Emergence, Tier 1
850.4150	Vegetative Vigor, Tier 1
830.7050	Ultraviolet/Visible Absorption

The label is acceptable provided the following changes are made:

1. Change the signal word that is immediately below the statement "KEEP OUT OF REACH OF CHILDREN" from "DANGER" to "DANGER/PELIGRO"
2. Add the following statement above the FIRST AID instructions: "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.)"
3. Put the **FIRST AID** instructions into a text box to set them off from the rest of the text.
4. In the section **HAZARDS TO HUMANS AND DOMESTIC ANIMALS** change "...and protective clothing." to "...chemical resistant gloves made of any waterproof material, long-sleeved shirt and long pants, chemical resistant apron and chemical resistant footwear. Avoid working near high concentrations of spray mist/vapor. Use with adequate ventilation."
5. Add the following in a text box immediately above the **ENVIRONMENTAL HAZARDS STATEMENT**: "**USER SAFETY RECOMMENDATIONS**: 1. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2. Remove clothing/PPE immediately is pesticide gets inside. Then wash thoroughly and put on clean clothing."
6. Put the **STORAGE AND DISPOSAL** instructions into a text box to set them off from the rest of the text.

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7. Change the **Container Disposal** instructions to read:

"Container Disposal (Large plastic containers – 55 gallons, 275 gallons)

Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container promptly after emptying

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Offer rinsed container for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke."

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supersedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

The Agency has determined that the registrant may distribute and sell propionic acid products bearing old labels/labeling for 12 months from the date of issuance of this letter. Registrants and persons other than the registrant remain obligated to meet existing stocks requirements applicable to products they sell or distribute.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

Lisa Jones FOR
Shaja B. Joyner
Product Manager (20)
Fungicide Branch
Registration Division (7504P)

Enclosure: Label stamped "Accepted with Comments"

GREEN LABEL

Hay Preservative

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ACTIVE INGREDIENT

Propionic Acid 68.0%

OTHER INGREDIENTS: 32.0%

Aqua Ammonia, Acetic Acid, Propylene Glycol, Citric Acid, Water, Color.

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN DANGER CAUSES IRREVERSIBLE EYE DAMAGE

First Aid:

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lens, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If on skin or clothing: 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 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 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: Move person to fresh air. If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles or face shield) and protective clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS STATEMENT:

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 contaminate water when cleaning equipment or disposing of equipment wash waters.

PHYSICAL OR CHEMICAL HAZARDS:

Combustible: Do not use, pour, spill, or store near heat or flame.

United Suppliers, Inc.
General Offices
Eldora, IA 50627
1-800-782-5123

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 9 2010

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

33270-11

Net Weight: #180020 -2250 lbs.

Lot No: 37308048

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Avoid working near high concentration of spray/mist or vapor. Use with adequate ventilation. Green Label is a preservative formulated to provide maximum preservation on silage, haylage, feed blends, hay, and stored grass forage (alfalfa, bermuda grass, bluegrass, brome grass, clover, cowpea hay, fescue, lespedeza, lupines, orchard grass, peanut hay, peavine hay, rye grass, soybean hay, sudan grass, timothy, vetch, and wheat grass) which is intended only for use as animal feed.

FOR USE ON HAY: Accurately determine moisture content of hay just prior to application.

Apply GREEN LABEL with an approved, calibrated set of low pressure spray nozzles achieving uniform coverage. Stop application immediately in event of spray failure or nozzle plugging. Do not store treated bales directly on dirt. This product may only be used during the baling process if appropriate baler equipment is used which prevents exposure of non-target organisms to this pesticide product. Do not apply to pre-harvest hay and straw, cut hay and straw in the field prior to baling, or to hay and straw after it has been baled. Apply product to the hay and straw as it is fed into the baler, using the rates on this label. The baler application equipment must prevent drippage and drift, and must function properly and be used/maintained in accordance with the manufacturer's written operation instructions.

Moisture:	12-18 %	19-21 %	22-23 %	24-25 %	26-28 %	29-30 %
Small Sq. & Lg. Round Bales	4 Lbs./Ton	5 Lbs./Ton	7 Lbs./Ton	10 Lbs./Ton	15 Lbs./Ton	20 Lbs./Ton
Large Sq. Bales (3x3 bales)	5 Lbs./Ton	6 Lbs./Ton	9 Lbs./Ton	12 Lbs./Ton	Do Not Bale	Do Not Bale
Note: For first and fourth cutting or rained-on hay, increase above rates by 3-5 pounds per ton.						

For use on silage, haylage, and feed blends apply at the recommended application rates.

Corn Silage and at 60-70% moisture: 2-3 lbs/ton.	Small grain silage at 60-70% moisture: 2-4 lbs/ton.
Haylage/Baleage at 50-70% moisture: 2-4 lbs/ton.	Feed Blends (short term storage): 1-3 lbs/ton. Increase rate for added stability.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Avoid contamination of stored pesticide with water or caustic. Store in a cool dry place. Keep container out of direct sunlight. Store above -20°F. Keep container closed when not in use.

Pesticide Disposal: Wastes and rinse-water should be used or reprocessed. Wastes can also be disposed of on-site or at an approved waste disposal facility. Open dumping is prohibited.

Container Disposal: Reseal container and offer for reconditioning or triple rinse (or equivalent) and offer for recycling, reconditioning, or disposal in approved landfill.

Pesticide Spillage: Neutralize with sodium carbonate, sodium bicarbonate, chalk, or lime.

General: Consult Federal, State, or Local disposal authorities for approved alternative procedures.

WARRANTY:

The manufacturer makes no warranties, expressed or implied, concerning this product or its use, which extend beyond the description on the face hereof. All statements made concerning this product apply only when used as directed and proper management is used in storing baled hay.

Product Color Change Will Not Affect Performance