

34052-19

5/11/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Daniel Wilson
H. Wilson Manufacturing Company, Inc.
P.O. Box 481
Jefferson, GA 30549

MAY 11 2010

Re: **Registration Review** for Hay Chem
EPA Registration 34052-19
Decision Number 419798
Response to EPA/SRRD Email Dated 12/11/08

Dear Mr. Wilson:

The Agency is in receipt of your revised label submitted September 9, 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 from "**DANGER**" to "**DANGER/PELIGRO**"
2. Add the following immediately below the signal word: "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 other text.
4. Add the following paragraph below the section **Hazards to Humans and Domestic Animals**:

"Follow the 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 and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them."

5. Add the following text box above the header **Environmental Hazards**:

USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should 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.

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

6. Put the **Storage and Disposal** instructions into a text box to set them off from the rest of the text.

7. Change the CONTAINER DISPOSAL instructions to read:

“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 or a mix tank 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.

30f7

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"

ACCEPTED
with COMMENTS
In EPA Letter Dated

4087

MAY 11 2010

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

(Hay Chem Label Center Panel-modified type size)

34052-19

HAY CHEM

(the following material will be 8 pt. type size)

ACTIVE INGREDIENT:	BY WEIGHT
Propionic Acid	68.52%
OTHER INGREDIENTS:	31.48%
Ammonium hydroxide, water, citric acid, dye.	
TOTAL:	100.00%

Product density 8.7 lb/gallon

(the following material is actual type size)

DANGER
KEEP OUT OF THE REACH OF CHILDREN
See side panel for additional precautionary statements.

FIRST AID

(the following material will be 8 pt. type size)

- IF IN EYES:** Hold eyes open and rinse with water for 15 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Seek immediate medical attention.
- IF SWALLOWED:** Do not give anything by mouth to an unconscious person. Drink large quantities of water. Contact the poison control center for first aid advice. Do not induce vomiting unless told to do so by the poison control center. Seek immediate medical attention.
- IF INHALED:** Move person to fresh air. If the person is not breathing call 911, then give artificial respiration. Seek immediate medical attention.
- IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 minutes. Seek medical attention if skin appears red or is irritated. Wash contaminated clothing before using again.
- Have product label or Material Safety Data Sheet with you when calling the poison control center, doctor, or going for treatment.**
- NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

Manufactured by:

EPA Reg. No. 34052-19
EPA Est. No. 34052-GA-1



PO Box 481 Jefferson, GA 30549

Net contents:

(Hay Chem Label Right Panel-modified type size)

(the following material is actual type size)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

(the following material will be 8 pt type size)

Corrosive. Causes irreversible eye damage. Do not get in eyes. Wear protective eyewear (goggles, face shield, or safety glasses). Harmful if swallowed, or absorbed through skin. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Wear chemical resistant gloves, chemical resistant footwear, and goggles or face shield when loading application equipment. Avoid working near high concentrations of spray mist or vapors. Use adequate ventilation.

(the following material will be 10 pt type size)

Environmental Hazards

(the following material will be 8 pt type size)

For terrestrial uses. Do not apply 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.

(the following material will be 10 pt type size)

Storage and Disposal

(the following material will be 8 pt type size)

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

PESTICIDE STORAGE: Seal tightly. Do not store in direct sunlight.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

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

Specific Gravity is 1.065 to 1.075 at 70°F. Freezes at -5°F. Freezing does not deteriorate product. However, citric acid may crystallize out when product freezes. After warming, mix product to bring citric acid back into solution.

All responsibility for the proper use, storage, and handling of the product is the responsibility of the buyer. H. Wilson Manufacturing Co., Inc. makes no other claims or warranties, expressed or implied.

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(Hay Chem Label Left Panel-modified type size)

Directions for Use

(the following material on this panel will be 8 pt. type size)

It is a violation of federal law to use this product in a manner inconsistent with its labeling. HAY CHEM is a buffered propionic acid for suggested for use as a preservative to prevent mold growth in processing high moisture hay, corn, grain silage (barley, corn, oat, sorghum, and wheat), haylage, and feed blends. It can be used post harvest on alfalfa, Bermuda grass, blue grass, brome grass, clover, cowpea hay, fescue, lespedeza, lupines, orchard grass, peanut hay, peavine hay, rye grass, soybean hay, sudan grass, timothy, and vetch.

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.

The product's effectiveness depends treatment methods and rates of application. Since moisture content determines application rate be sure that moisture level is known. Follow recommended application rates within each moisture range.

FOR USE ON HAY: Spray HAY CHEM onto the hay as it is fed into the baler using the application rate on the chart below based on moisture level:

Hay Moisture	Small Square/Large Round Bales		Large Square Bales	
	Stem Moisture	Dew Moisture	Stem Moisture	Dew Moisture
16-21%	4 lb/ton	2 lb/ton	6 lb/ton	3 lb/ton
22-26%	8 lb/ton	6 lb/ton	10 lb/ton	8 lb/ton
27-30%	16 lb/ton	12 lb/ton	Do not bale	16 lb/ton
Over 30%	Not recommended	Not recommended	Not recommended	Not recommended

1. Always check the moisture level when baling high moisture hay.
2. Avoid baling if windrow moisture level exceeds 30 percent.
3. For rained on hay or poorly ventilated hay increase the application rate by 4-5 lb/ton.
4. Make sure that spray nozzle placement and openings are such to give good even coverage.
5. Do not store dry hay on top of treated wet hay.

FOR USE ON CORN: Spray HAY CHEM on the corn using the application rates indicated by the chart below:

Grain	Moisture	Rate
Ground ear corn	28-34%	4-5 lb/ton
Shelled corn- cracked or rolled	24-30%	4-6 lb/ton

1. Harvest at full dent and at proper moisture level.
2. Apply HAY CHEM at the correct rate based on moisture content.
3. Make sure that the silo does not have any cracks or holes that will allow water leakage.
4. Ensile rapidly with uniform distribution in the silo and with all kernels cracked.
5. Pack well for good fermentation. Seal off with plastic sheeting. It is good practice to feed off the top four feet before sealing as good compaction is not possible near the top.

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FOR USE ON SILAGE, HAYLAGE, AND FEED BLENDS: Spray HAY CHEM on the crop at chopper intake or blower intake using the application rate indicated by the chart below:

Crop	Moisture	Rate
Corn silage	60-70%	2-3 lb/ton
Small grain silage	60-70%	2.5-3.5 lb/ton
Haylage	50-70%	2.5-3.5 lb/ton
Feed Blend (short term storage)		2-4 lb/ton (increase rate to increase stability)