



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Chris Mason  
Loveland Products Inc.  
PO Box 1286  
Greeley, CO 80634-186

JUL 15 2010

Subject: Metam Soil Fumigant  
EPA Reg. No. 34704-647  
Update to Label Amendment Letter

Dear Mr. Mason:

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.

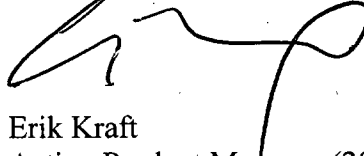
1. (Label p.3) (EPA Comment 3-d)  
Replace EPA's comment with this text:
  - In the "User Safety Requirements" section, add the following sentences: "DO NOT transport contaminated clothing inside a closed vehicle unless stored in a sealed container. Wash or dispose as specified."
2. (Label p.4) (EPA Comment 4-c)  
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. Do not use in a greenhouse or any other enclosed structure or confined area."
3. (Label p.4)  
Remove the following text from the top of page 4:
  - "CALIFORNIA ONLY: Application must be in compliance with Technical Information Bulletin for California entitled 'Metam Sodium Guideline for All Application Methods in California.' This information bulletin may be obtained from you local pesticide dealer or a Metam Sodium registrant."
4. (Label p.6) (EPA Comment 6-a)  
Replace EPA's comment with the following text:

- At the end of the Protection for Handlers section (after the location where the Personal Protective Equipment section is moved) 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.”
5. (Label multiples pages)  
Remove the “Air Temperature” section from all GAPs.
  6. (Label p.13) (EPA Comment 8-j)  
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.
  7. (Label p.20)  
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.”
  8. (Label p.27) (EPA Comment 13-b)  
Replace EPA’s comment with the following text:
    - Must insert the following section:
      - Statements Concerning Chemigation of Metam Soil Fumigant
      - Observe the Following Precautions if Your Chemigation System is Connected to a Public Water System (stop before "The pesticide injection pipeline must. .." and add **“Any alternatives to the required safety devices in this label must conform to the list of EPA-approved alternative devices.”**)
  9. (Label p.32) (EPA Comment 16-f)  
Replace EPA’s comment with the following text:  
“Delete the “Tarp Method” section under “Tobacco Plant Beds.”
  10. (Label p.33)  
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](mailto:occonnell.cathryn@epa.gov) or Erik Kraft by phone at (703)308-9358 or via email at [kraft.erik@epa.gov](mailto:kraft.erik@epa.gov).

Sincerely,



Erik Kraft  
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Fungicide Branch  
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