

PM 23

45639-180

10/16/98

Pg 126

OCT 16 1998

Mr. Victor A. Dorr
AgrEvo USA Company
Little Falls Centre One
2711 Centerville Road
Wilmington, DE 19808

Dear Mr. Dorr:

Subject: Ignite® Technical

EPA Registration No. 45639-180

Your Letter Dated July 24, 1998, Request To Amend Product Registration by Revising Its Confidential Statement of Formula (CSF, and signal word and First Aid Statements; and To Change the Name of Product To: "Glufosinate-Ammonium Technical"; and Your Letter Dated August 31, 1998, Resubmission of Revised Product Label To Add a "Note to Physicians" Section to the Label and To Revise Instructions To Be Followed Following Accidental Ingestion and Contact with Skin.

The Confidential Statement of Formula submitted on EPA Form 8570-4 and dated July 22, 1998 along with data on the impurities (EPA SRID No. 446110-01) have been reviewed and found unacceptable to support the use of the CSF dated July 22, 1998. The basic formulation is not acceptable as it is not in compliance with PR Notice 91-2 and does not agree with the label claimed nominal concentration. The nominal concentration of the active ingredient on the CSF is stated to be 100%; whereas, the claim on the proposed label is 95% (which is the lower certified limit).

The proposed label amendments described in the subject letters have been reviewed. The August 31 1998 proposed label submitted is acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, provided that you:

1. Submit one (1) copy of your final printed label prior to releasing this pesticide product for shipment under the subject label, after revision as directed in comment 1 above.

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA, section

CONCURRENCES

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SURNAME							
DATE							

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(e). Your release for shipment of the product constitutes acceptance of this condition.

A stamped copy of the proposed label is enclosed for your records.

The name change proposed for this pesticide is acceptable and should be used in all future correspondence regarding its registration under FIFRA.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7503C)

Enclosure

E.Wilson: Ignite:04-23-97

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Revised: August 31, 1998 (Edition # 3)

GLUFOSINATE-AMMONIUM TECHNICAL

**A HERBICIDE FOR FORMULATION PURPOSES ONLY
NOT FOR RESALE UNDER THIS LABEL**

ACTIVE INGREDIENT:

Glufosinate-ammonium† (CAS Number 77182-82-2) 95.00%*

OTHER INGREDIENTS:.....

5.00%
TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration Number 45639-180

EPA Est. No. 45639-DEU-001
45639-MI-001

Net Contents: [Various sizes]

* Protected by U.S. Patent No. 4,400,196



AgrEvo USA Company

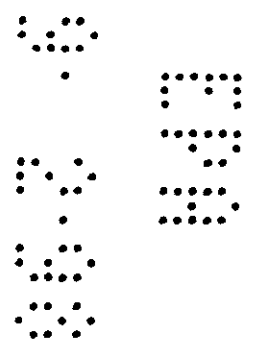
**Little Falls Centre One
2711 Centerville Road
Wilmington, DE 19808**

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

OCT 16 1998

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

45639-180



PRECAUTIONARY STATEMENTS

FIRST AID STATEMENT

- If swallowed:** Rinse mouth thoroughly with plenty of water. Do NOT induce vomiting. Get medical attention immediately.
- If in eyes:** Flush eyes with plenty of water. Get medical attention if irritation persists.
- If on skin:** Wash with plenty of soap and water.
- If inhaled:** Remove individual to fresh air. Get medical attention if breathing difficulty develops.

NOTE TO PHYSICIAN

Glufosinate-ammonium is a glutamine synthetase inhibitor and can interfere with neurotransmitter function. Symptoms may be delayed by up to 48 hours following ingestion. There is no specific antidote. If ingested, endotracheal intubation and gastric lavage should be performed as soon as possible, followed by charcoal and sodium sulfate administration. **Additionally, call 1-800-471-0660 for further information.**

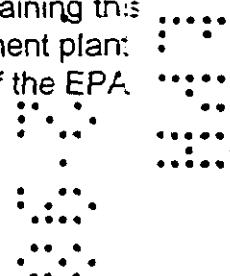
In case of medical, environmental or transportation emergencies or inquiries, call 1-800-471-0660 (24 hours/day).

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.



STORAGE AND DISPOSAL

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

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

Empty containers should be triple rinsed. Do not reuse empty containers. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

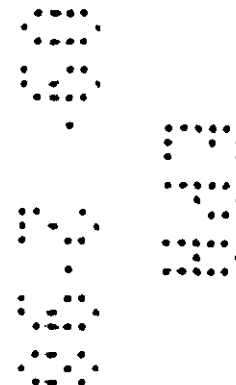
DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use this product until you have read the entire label.

This technical product may be used only for formulation into a herbicide for

1. The following uses:
 - for weed control of emerged weeds in noncrop areas
 - for control of weeds and grasses in residential and industrial areas
 - for weed control in apples, grapes, and the tree nut group and weed control in glufosinate-ammonium tolerant corn and soybeans
2. Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration and
3. Uses for experimental purposes that are in compliance with U.S. EPA requirements

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group, or grower has complied with U. S. EPA data submission requirements regarding the support of such use(s).



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IMPORTANT: READ BEFORE USE

By using this product, user or buyer accepts the following conditions, warranty, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, because of extreme weather conditions and soil conditions, manner of use and other factors beyond AgrEvo USA Company's control, it is impossible for AgrEvo USA Company to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, WHICH EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of AgrEvo USA Company is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. AgrEvo USA Company disclaims any liability whatsoever for incidental or consequential damages, including, but not limited to, liability arising out of breach of contract, express or implied warranty (including warranties of merchantability and fitness for a particular purpose), tort, negligence, strict liability or otherwise.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT AGREVO USA COMPANY'S ELECTION, THE REPLACEMENT OF PRODUCT.

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Reg. Code: 0

