



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Attn: Jeffrey Hartman
Chemrose, Ltd.
1596 NE 58th Avenue
Des Moines, Iowa 50313

SEP 23 2008

Subject: Propionic Acid 68%
EPA Registration No. 46059-1
Your label amendment submission dated April 8, 2008

Dear Mr. Hartman,

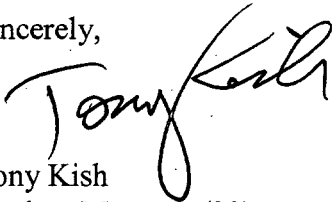
The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the registrant complies with the conditions specified herein. Within 45 days of the date hereon, the registrant must submit a revised final printed label. A copy of the label, stamped "Accepted with Comments," is enclosed.

1. On page 2, in the table referring to corn usage, change 'lb/ton' to 'lbs/ton'.
2. Wherever '#' is used, change to 'lbs' to establish consistency throughout label.
3. In the table 'For Use On Hay', on page 3, specify a range for '<22%', such as '16 - 22%'. For instance, the table's present observation of '<22%' suggests that as little as 0 - 10% moisture qualifies as an acceptable range, which may lead to an unnecessary treatment that could result in compromising product efficacy or some other unintended consequence.
4. Each table heading, 'FOR USE ON CORN', 'FOR USE ON HAY', 'FOR USE ON SILAGE, HAYLAGE, AND FEED BLENDS' must appear in bold headings to improve the label's legibility.
5. The first sentence in the 'Warranties and Precautions' section must be revised to read: "To the extent consistent with applicable law the manufacturer makes no warranties...."

6. In the 'Silage' table, on page 3, replace the ambiguous guidance, "*(increase rate to increase stability)*," with the following or a variation thereof: "*When disease pressure is high, use higher rate to attain desired stability.*"

If you have any questions, please contact Bryant Crowe by phone at (703) 305-0025 or via email at crowe.bryant@epa.gov.

Enclosure

Sincerely,

Tony Kish
Product Manager (22)
Fungicide Branch
Registration Division (7505P)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

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 clothing before reuse.

Wear chemical-resistant gloves, chemical resistant aprons, long-sleeved shirt and long pants, chemical resistant footwear, and goggles or face shield when loading application equipment unless a closed system is used. Avoid working near high concentrations of spray mist/vapor. Use with adequate ventilation. Wash thoroughly after handling.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water.

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.

ENVIRONMENTAL HAZARDS

For terrestrial uses. 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 washwaters.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Do not apply product through any type of irrigation system.

GENERAL INFORMATION

One gallon = 8.89 lbs/gallon. 1 lb. of product is equivalent to 14 fluid ounces of PROPIONIC ACID 68%

PROPIONIC ACID 68% is a buffered propionic acid for use as a preservative 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, bluegrass, brome grass, clover, cowpea hay, fescue, lespedeza, lupines, orchard grass, peanut hay, Peavine hay, rye grass, soybean hay, sudan grass, timothy, and vetch.

FOR USE ON CORN: Spray PROPIONIC ACID 68% on the corn using the application rate indicated in the chart below:

GRAIN	MOISTURE	RATE
Ear Corn	28 - 34%	4-5 lb/ton
Shelled Corn	24 - 30%	4-6 lb/ton

1. Make sure the silo does not have any cracks or holes that will allow air leakage.
2. Harvest at full dent and at the proper moisture level:
 - Ground ear corn: 28-34% moisture
 - Cracked or rolled corn: 24-30% moisture

3. Ensilage rapidly with uniform distribution in the silo and all kernels cracked.
4. Apply at the correct rate based on the moisture content.
5. Pack well for good fermentation. Seal off with plastic sheeting. It is good practice to feed off of the top four feet before sealing as good compaction is not possible near the top.

FOR USE ON HAY: Spray PROPIONIC ACID 68% on the hay as it is fed into the baler using the application rate indicated in the chart below:

MOISTURE %	SMALL SQUARE AND LARGE ROUND BALES	LARGE SQUARE BALES
<22% Stem moisture	4 #/ton	6 #/ton
<22% Dew moisture	2 #/ton	3 #/ton
22-26% Stem moisture	8 #/ton	10 #/ton
22-26% Dew moisture	6 #/ton	8 #/ton
27-30% Stem moisture	16 #/ton	Do not bale
27-30% Dew moisture	12 #/ton	16 #/ton

1. Avoid baling if the windrow moisture exceeds 30 percent.
2. Always check the hay moisture level before baling high moisture hay.
3. For rained on hay or poorly ventilated storage, increase the application rate by 4-5 #/ton.
4. Make sure that the spray nozzle's openings and placement are such that good coverage is obtained.
5. Make sure that the storage area for the baled hay is well ventilated.
6. Do not store untreated dry hay on top of treated wet hay.

FOR USE ON SILAGE, HAYLAGE, AND FEED BLENDS: Spray PROPIONIC ACID 68% on 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 #/ton
Small Grain Silage	60-70%	2.5-3.5 #/ton
Haylage	50-70%	2.5-3.5 #/ton
Feed Blend (short term storage)	-	2-4 #/ton (increase rate to increase stability)

STORAGE AND DISPOSAL

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

Refillable container. Refill this container with Propionic Acid 68% only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

CONTAINER DISPOSAL: To clean container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into rinsate collection system. Repeat this rinsing procedure two more times. 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.

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.

WARRANTIES AND PRECAUTIONS

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 concerning this product apply only when used as directed. This product will not harm paint or equipment on limited contact. Constant or prolonged contact may damage some paints. If propionic acid type products, even when buffered, are directly applied to vegetation they may cause stunting of forage growth.