



5/11/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Jeffrey S. Hartman
Formulation Chemist
Chemorse, Ltd.
1596 NE 58th Avenue
Des Moines, IA 50313

MAY 11 2010

Re: **Registration Review** for Propionic Acid 68%
EPA Registration 46059-1
Decision Number 419794
Response to EPA/SRRD Email Dated 12/11/08

Dear Mr. Hartman:

The Agency is in receipt of your revised label submitted December 19, 2008, 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. Put the **FIRST AID** instructions into a text box to set them off from the rest of the text.
2. In the third paragraph following the header **Hazards to Humans and Domestic Animals** change "If no such instructions for washables, use...." to "If no such instructions for washables exist, use...."
3. Add the following to the **USER SAFETY RECOMMENDATIONS** box: "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.
4. Put the **STORAGE AND DISPOSAL** instructions into a text box to set them off from the rest of the text.

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

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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"

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Propionic Acid 68%

Mold Inhibitor for Stored Grains and Forage Hay

ACTIVE INGREDIENTS:

Propionic Acid 68.0%

OTHER INGREDIENTS: 32.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER/PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

FIRST AID

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- 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, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER - You may also contact 1-800-424-9300 for emergency medical treatment information.

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

See inside booklet for additional precautionary statements.

EPA Reg. No. 46059-1
AD 12192008

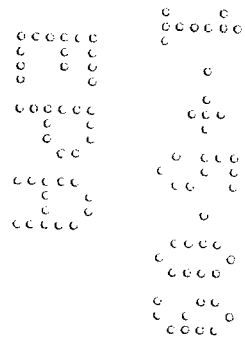
EPA Est. No. 74023-TX-001

NET CONTENTS:

**ACCEPTED
with COMMENTS
In EPA Letter Dated
MAY 11 2010**

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

**MANUFACTURED FOR:
Chemorse, Ltd.
1596 NE 58th Avenue
Des Moines, Iowa 50313**



46059-1

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.

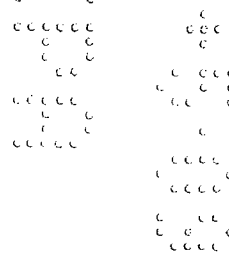
DIRECTIONS FOR USE

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. 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 drifpage and drift, and must function properly and be used/maintained in accordance with the manufacturer's written operation instructions.



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 Lbs./ton
Shelled Corn	24 - 30%	4-6 Lbs./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
16-22% Stem moisture	4 Lbs./ton	6 Lbs./ton
16-22% Dew moisture	2 Lbs./ton	3 Lbs./ton
22-26% Stem moisture	8 Lbs./ton	10 Lbs./ton
22-26% Dew moisture	6 Lbs./ton	8 Lbs./ton
27-30% Stem moisture	16 Lbs./ton	Do not bale
27-30% Dew moisture	12 Lbs./ton	16 Lbs./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 Lbs./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:

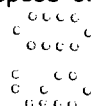
CROP	MOISTURE %	RATE
Corn Silage	60-70%	2-3 Lbs./ton
Small Grain Silage	60-70%	2.5-3.5 Lbs./ton
Haylage	50-70%	2.5-3.5 Lbs./ton
Feed Blend (short term storage)	-	2-4 Lbs./ton (When disease pressure is high use higher rate to attain desired stability.)

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.



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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

To the extent consistent with applicable law, 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.

