

51036-419

12-10-2003

117



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

Date of Issuance:

51036-419

12/10/2003

NOTICE OF PESTICIDE:

Registration
 Reregistration

Term of Issuance:

Conditional

Name of Pesticide Product:

Picloram TIPA
Technical

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Micro-Flo Company, LLC
P.O. Box 772099
Memphis, TN 38117

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided you agree in writing that:

1. Registration is contingent on approval of currently initiated storage stability (830.6317) and corrosion characteristics (830.6320) one year studies.
2. Address the following CSF deficiencies:
 - a) Chemical name on the proposed picloram TIPA Technical must be included in column 10 of the CSF, along with the 50.13% picloram equivalent, as listed on label.
 - b) Box 4 must include the Reg. No, 51036-419.
 - c) The CSF should be revised to comply with the Agency format for integrated products which are produced as a result of chemical reactions between two or more chemical compounds. See attached.
 - d) Submit material data safety sheets for all reactants used to produce the technical.
3. Submit samples of Picloram TIPA to the EPA laboratory in Fort Mead.
4. Change Signal word to CAUTION

Signature of Approving Official:

Date:

12/10/2003

James Tompkins, Product Manager (25)
Herbicide Branch, Registration Division (7505C)

47

5. Change EPA Reg. No. on label from 51036-URO to 51036-419.

6. Add an appropriate EPA establishment number on label.

7. Change First Aid statements to:

"FIRST AID

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 mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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 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. You may also contact 1-800-XXX-XXXX for emergency medical treatment information."

8. Change PRECAUTIONARY STATEMENTS to:

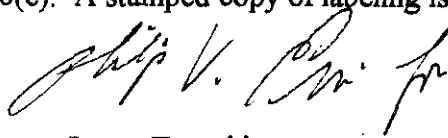
"Harmful if swallowed. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash clothing before reuse."

9. Remove "Open dumping is prohibited" from directly under STORAGE AND DISPOSAL, and place under subsection Pesticide Disposal.

10. Add subsection Pesticide Storage under STORAGE AND DISPOSAL, with appropriate text following. Place before Pesticide Disposal section, and after the phrase "Do not contaminate water, food, or feed by storage and disposal."

11. Add a statement to the label that states: "This technical product can only be used to formulate end use products which have an EPA approved stewardship program in place."

You will submit three (3) copies of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). A stamped copy of labeling is enclosed for your records.



James Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

CONFIDENTIAL APPENDIX:**CSF Changes Conclusion 1c., continued**

The CSF should be revised to comply with the Agency format for integrated products (products which are produced as a result of chemical reactions between two or more chemical compounds).

1. In the first row, list the Picloram TIPA Salt produced, with the Reg No. 51036-URO in column 12, the % by weight in column 13b, the UCL and LCL in 14 a and b and the purpose, active ingredient, in column 15.
2. In the second row, list the phrase "Obtained from Reacting."
3. In the next row, give the pertinent data for the reactants.
 - 3a. In row one for the reactants, list the Picloram acid in column 10 with its purity of 94.75%, the Reg no. in column 12, 51036-UNU; fill out columns 13a, 13b, 14a, 14b, and in column 15, list the purpose in the formulation as "starting material."
 - 3b. In row two for the reactants, list triisopropanolamine in column 10, then fill out columns 13a, 13b, 14a, 14b, and in column 15, list the purpose in the formulation as "starting material."
4. The amounts listed in box 17 of the CSF (the total amounts added) should be adjusted.
5. The total in column 13b must be 100%.
6. See the example provided.

CONFIDENTIAL APPENDIX:

830.1620. Description of production process: (MRID No. 45787201)

Synthesis of Picloram TIPA involves picloram acid and triisopropylamine (TIPA) using ethanol as a solvent, reaction medium and washing solvent, as follows:

1. Picloram acid is neutralized using TIPA to the TIPA salt of picloram. Reactants are inspected for quality assurance purposes.
2. Ethanol, serving as solvent and reaction medium is placed into a glass-lined vessel, agitated, heated and refluxing with TIPA which is slowly added over eight hours.
3. After all TIPA is added, an additional reflux of 2 hours is conducted.
4. The reaction product is cooled, and stands for 2 hours, and most of the Picloram TIPA precipitates out of solution.
5. The product is filtered and ethanol is used to wash the reaction product, which is filtered, collected and dried under vacuum, between 40-45 C for 8 hours.
6. NOTE: The Material Safety Data Sheets for all reactants must be submitted.

830.1670. Discussion on the formation of impurities (provided by registrant): (MRID No. 45787201)

The Registrant has stated that impurities are due to their presence in beginning materials, unreacted reagents, unintended reactions between reactants or their degradates, residual solvents.

5/7

PICLORAM TIPA TECHNICAL

For Manufacturing Use Only

ACTIVE INGREDIENT:

Picloram: 4-amino-3,5,6-trichloropicolinic Acid,
triisopropanolamine salt 90.0%

INERT INGREDIENTS: 10.0%

TOTAL: 100.0%

Picloram acid equivalent - 50.13%

KEEP OUT OF REACH OF CHILDREN

WARNING

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 the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

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.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

EPA Reg. No. 51036-appl.

EPA Est. No. XXXXX-XX-XXX

NET CONTENTS: _____

ACCEPTED
with COMMENTS
in EPA Letter Dated

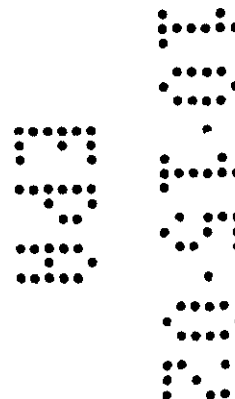
DEC 10 2003

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

51036-419

Manufactured For:
MICRO FLO COMPANY LLC
P.O. BOX 772099
MEMPHIS, TN 38117

PRECAUTIONARY STATEMENTS



6/7

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Harmful if swallowed or absorbed through skin.

Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

EMERGENCY NUMBERS:

- Transportation or spill, call CHEMTREC 800-424-9300.
- Human health, call Poison Control Center at 800-900-4044.
- Animal health, call ASPCA at 800-345-4735.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. 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.

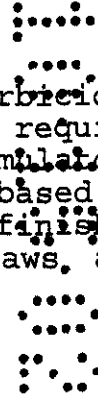
DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a herbicide for the following uses:

- Rangeland and permanent grass pastures
- Barley, oats and wheat
- Fallow cropland
- Conservation Reserve Program (CRP)
- Forests
- Non-cropland

Because of their properties and intended uses, herbicides formulated from Picloram TIPA Technical herbicide may require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finished formulations, and in accordance with all pertinent laws, and regulations.



7/7

HANDLING PRECAUTIONS

Do not contaminate water: Do not allow Picloram TIPA Technical to contaminate water used for irrigation, drinking, or other domestic purposes. Do not clean containers near water used for these purposes.

Do not contaminate atmosphere: When formulating dry products, do not allow dust particles from Picloram TIPA Technical to contaminate the atmosphere. Small amounts may injure certain broadleaf plants.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

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

CONTAINER DISPOSAL: Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

WARRANTY LIMITATIONS AND DISCLAIMER

Micro Flo warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use, subject to the inherent risks, referred to above. MICRO FLO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL MICRO FLO OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. Micro Flo and the Seller offer this product, and the Buyer and User accept it, subject to the foregoing Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative of Micro Flo Company.

