

58190-1

4/9/2010

lofle



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Tanya Graf  
Organic Registration Specialist  
Alltech, Inc.  
3031 Catnip Hill Pike  
Nicholasville, KY 40356

APR 9 2010

Re: **Registration Review** for Alfa-Save  
EPA Registration Number 58190-1  
Decision Number 419796  
Response to EPA/SRRD Email Dated 12/30/08

Dear Ms Graf:

The Agency is in receipt of your revised label submitted September 9, 2009, 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. Add the following immediately below the Spanish language warning: “(If you do not understand the label, find someone to explain it to you in detail.)”
2. In the **STORAGE AND DISPOSAL** instructions, replace the CONTAINER DISPOSAL instructions with the following:

“Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container promptly after emptying

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

APR 9 2010

2010

container upside down over application equipment or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

**Plastic containers:** Offer rinsed container for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Metal containers:** Offer rinsed container for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.”

3. Put **STORAGE AND DISPOSAL** instructions into a 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 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](mailto: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”

3096

# ALFA-SAVE

For Prevention of Mold Growth in Forage Preserved as Hay and in Stored Grains

ACCEPTED with COMMENTS In EPA Letter Dated

APR 9 2010

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

**ACTIVE INGREDIENT:**

Propionic Acid..... 63.0%

**OTHER INGREDIENTS:**..... 37.0%

**TOTAL:**..... 100.0%

58190-1

## KEEP OUT OF REACH OF CHILDREN DANGER- PELIGRO

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

SI USTED NO ENTIENDE LA ETIQUETA, BUSQUE A ALGUIEN PARA QUE SE LA EXPLIQUE A USTED EN DETALLE.

<b>FIRST AID</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378 for emergency medical treatment information.	
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have a person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>Inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.	



Biotechnology Center • 3031 Catnip Hill Pike • Nicholasville, KY 40356  
Phone (859) 885-9613 • Fax (859) 885-6736 • <http://www.alltech.com>

EPA Reg. No. 58190-1  
EPA Est. No. 58190-KY-001

NET CONTENTS \_\_\_\_\_

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed, absorbed through skin, or inhaled. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS**

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 wash waters.

**DIRECTIONS FOR USE**

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

ALFA-SAVE is appropriate for use on forage crops (Alfalfa, Bermuda grass, Bluegrass, Brome grass, Clover, Fescue, Lespedeza, Lupines, Orchard grass, Peanut, Peavine, Rye grass, Soybean, Timothy, Vetch) preserved as hay, whether in conventional baling systems, stackers, large round or square balers. ALFA-SAVE is also appropriate for addition to stored grains (Barley, Corn, Oat, Sorghum, Wheat).

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 hay and straw as it is fed into the baler, using the rates on this label. The baler application equipment must prevent drippage and drift, and must function properly and be used/maintained in accordance with the manufacturer's written operation instructions.

Product effectiveness depends on method of application and treatment rate. As moisture level determines treatment rates, ensure that hay moisture level is known. FOLLOW RECOMMENDED RATES WITHIN EACH MOISTURE RANGE! When usage rate recommendations are followed, ALFA-SAVE will protect hay through the curing/drying process when adequately protected from weather.

**APPLICATION:**

Uniform distribution is very important. The hay should be raked into medium-sized, fluffy windrows. A 3-nozzle boom should be attached to the baler pick-up such that hay is sprayed while still fluffy so the spray can penetrate the windrow. Fan-type nozzles should be used with a minimum pressure of 20 lbs. per square inch. Flood type nozzles are not satisfactory.

**BATCH NUMBER:**

**ALFA-SAVE APPLICATION RATES FOR HAY**

Moisture Level            18-22%            23-26%            27-30%

ALFA-SAVE /ton            6 lbs.            12 lbs.            18 lbs.

**ALFA-SAVE APPLICATION RATES FOR LARGE AND SQUARE BALES**

Moisture Level            16-20%            21-24%            25-28%

ALFA-SAVE /ton            6 lbs.            12 lbs.            18 lbs.

**ALFA-SAVE APPLICATION RATES FOR STORED GRAIN**

Apply as grains go into storage bins. DO NOT ADD TO GRAINS STORED IN EXCESS OF 15% MOISTURE.

Moisture Level            12-15%

ALFA-SAVE /ton (US)            1 lb.

kg/ton (metric)            0.5 kg

**STORAGE AND DISPOSAL**

*DO NOT CONTAMINATE FOOD OR FEED BY STORAGE OR DISPOSAL.*

**PESTICIDE STORAGE:** Store ALFA-SAVE in original container. Avoid storage 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.

**CONTAINER DISPOSAL: Plastic:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Metal:** Triple rinse (or equivalent). 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.

To the extent consistent with applicable law, seller is not responsible for damage, loss or injury of any kind including, without limiting, lost profits. This product must be used as instructed. Express and implied warranties are disclaimed and sellers' responsibility shall not exceed the purchase price of the product. Variation in color does not affect product performance.

**EXPIRATION DATE:**

# ALFA-SAVE

For Prevention of Mold Growth in Forage  
Preserved as Hay and in Stored Grains

## ACTIVE INGREDIENT:

Propionic Acid..... 63.0%  
OTHER INGREDIENTS..... 37.0%  
TOTAL:..... 100.0%

## KEEP OUT OF REACH OF CHILDREN DANGER- PELIGRO

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

SI USTED NO ENTIENDE LA ETIQUETA, BUSQUE A ALGUIEN PARA QUE SE LA EXPLIQUE A USTED EN DETALLE.

### FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378 for emergency medical treatment information.

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have a person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If inhaled	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>

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

# Alltech

Biotechnology Center • 3031 Catnip Hill Pike • Nicholasville, KY 40356  
Phone (859) 885-9613 • Fax (859) 885-6736 • <http://www.alltech.com>

EPA Reg. No. 58190-1  
EPA Est. No. 58190-KY-001

NET CONTENTS

## ALFA-SAVE APPLICATION RATES FOR HAY

Moisture Level	18-22%	23-26%	27-30%
----------------	--------	--------	--------

ALFA-SAVE /ton	6 lbs.	12 lbs.	18 lbs.
----------------	--------	---------	---------

## ALFA-SAVE APPLICATION RATES FOR LARGE AND SQUARE BALES

Moisture Level	16-20%	21-24%	25-28%
----------------	--------	--------	--------

ALFA-SAVE /ton	6 lbs.	12 lbs.	18 lbs.
----------------	--------	---------	---------

## ALFA-SAVE APPLICATION RATES FOR STORED GRAIN

Apply as grains go into storage bins. DO NOT ADD TO GRAINS STORED IN EXCESS OF 15% MOISTURE.

Moisture Level	12-15%
----------------	--------

ALFA-SAVE /ton (US)	1 lb.
kg/ton (metric)	0.5 kg

## STORAGE AND DISPOSAL

DO NOT CONTAMINATE FOOD OR FEED BY STORAGE OR DISPOSAL.

**PESTICIDE STORAGE:** Store ALFA-SAVE in original container. Avoid storage 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.

**CONTAINER DISPOSAL:** Plastic: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Metal:** Triple rinse (or equivalent). 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.

To the extent consistent with applicable law, seller is not responsible for damage, loss or injury of any kind including, without limiting, lost profits. This product must be used as instructed. Express and implied warranties are disclaimed and sellers' responsibility shall not exceed the purchase price of the product. Variation in color does not affect product performance.

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed, absorbed through skin, or inhaled. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

## ENVIRONMENTAL HAZARDS

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 wash waters.

## DIRECTIONS FOR USE

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

ALFA-SAVE is appropriate for use on forage crops (Alfalfa, Bermuda grass, Bluegrass, Brome grass, Clover, Fescue, Lespedeza, Lupines, Orchard grass, Peanut, Peavine, Rye grass, Soybean, Timothy, Vetch) preserved as hay, whether in conventional baling systems, stackers, large round or square balers. ALFA-SAVE is also appropriate for addition to stored grains (Barley, Corn, Oat, Sorghum, Wheat).

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 hay and straw as it is fed into the baler, using the rates on this label. The baler application equipment must prevent drippage and drift, and must function properly and be used/maintained in accordance with the manufacturer's written operation instructions.

Product effectiveness depends on method of application and treatment rate. As moisture level determines treatment rates, ensure that hay moisture level is known. FOLLOW RECOMMENDED RATES WITHIN EACH MOISTURE RANGE! When usage rate recommendations are followed, ALFA-SAVE will protect hay through the curing/drying process when adequately protected from weather.

## APPLICATION:

Uniform distribution is very important. The hay should be raked into medium-sized, fluffy windrows. A 3-nozzle boom should be attached to the baler pick-up such that hay is sprayed while still fluffy so the spray can penetrate the windrow. Fan-type nozzles should be used with a minimum pressure of 20 lbs. per square inch. Flood type nozzles are not satisfactory.

BATCH NUMBER:

EXPIRATION DATE:

REVISED:  
07-15-09

100FCU