

66222-137

7/27/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUL 27 2007

Ms. Jane Rothwell
Product Registration
MANA, Inc.
4515 Falls of Neuse Rd, Suite 300
Raleigh, NC 27609

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Primary Brand Name "Redi-Pik 1.5EC Cotton Defoliant"
EPA Reg. No. 66222-137
Application Dated June 13, 2007

Dear Ms. Rothwell:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 06/13/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

SIC

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 66222-137	2. EPA Product Manager JoAnne Miller	3. Proposed Classification <input type="checkbox"/> Nonrestricted <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Nations Ag II Thidiazuron/Diuron EC Cotton Defoliant	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Makhteshim Agan of North America, Inc. 4515 Falls of Neuse Rd., Suite 300 Raleigh, NC 27609 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(2)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other - Explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION OF PRIMARY BRAND NAME:
 New Name: Redi-Pik 1.5EC Cotton

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
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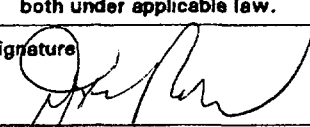
** Certification must be submitted*

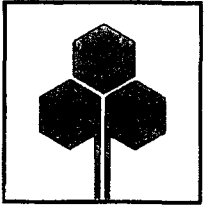
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> _____
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Jane Rothwell	Title Registration Specialist	Telephone No. (Include Area Code) 901-861-4400
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<p style="text-align: center;">Certification</p> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Registration Specialist	
4. Typed Name Jane Rothwell	5. Date June 13, 2007	



Makhteshim Agan of North America, Inc.

MANA

June 13, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Joanne Miller
Product Manager (23)
Herbicide Branch

Re Nations Ag II Thidiazuron/Diuron EC Cotton Defoliant
EPA Reg. No. 66222-137
Notification of Primary Brand Name Change in accordance with PR Notice 98-10

Dear Ms. Miller:

Makhteshim Agan of North America, Inc. notifies the Agency of its intention to market the referenced product under the primary brand name: Red-Pik 1.5EC Cotton Defoliant

In support of this request, the following documents are attached:

- Application for Pesticide Registration
- One copy of final printed labeling

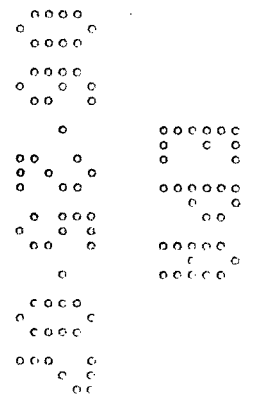
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Should you have questions about this submission, please contact Jane Rothwell at 901-861-4400.

Sincerely,

Jane Rothwell
Registration Specialist

Enclosures



Redi-Pik 1.5EC Cotton Defoliant

For Agricultural Use Only

ACTIVE INGREDIENTS:

Thidiazuron: N-phenyl-N'-1,2,3-thiadiazol-5-ylurea	12.0%
Diuron: 3-(3,4-dichlorophenyl)-1,1-dimethylurea	6.0%

INERT INGREDIENTS:	82.0%
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Contains 1 lb. Thidiazuron per gallon and .5 lb. Diuron per gallon.	TOTAL 100.0%
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EPA Reg. No. 66222-137

EPA Est. No. 07429-CA-001

Manufactured for:
Makhteshim Agan of North America, Inc.
4515 Falls of Neuse Rd., Suite 300
Raleigh, NC 27609

Net Contents: ___ Gallons

KEEP OFF 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 ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing • Rinse skin immediately with water for 15-20 minutes • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing • Call a poison control center or doctor for treatment advice
IF INHALED:	<ul style="list-style-type: none"> • 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 SWALLOWED:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice • Do not induce vomiting unless told to do so by a poison control center or doctor. • Have a person sip a glass of water if able to swallow • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact ProSAR at 1-877-250-9291 for emergency medical treatment information.</p> <p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Corrosive. Causes irreversible eye damage. Causes skin burns. Harmful if swallowed. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical resistant to this product are made of any waterproof material. If you want more options, follow the instructions for Category A on an EPA chemical-resistance category selection chart.

All pilots and flaggers must wear:

- Long sleeved shirt and long pants
- Shoes plus socks

All mixers, loaders, other applicators , and other handlers must wear:

- Coveralls over long sleeved shirt and long pants
- Chemical resistant footwear plus socks
- Chemical resistant gloves
- Goggles, face shield, or safety glasses
- Chemical-resistant apron when mixing/loading or cleaning equipment or spills
- Except for ground boom applicators, a NIOSH-approved particulate filtering respirator equipped with N, R, or P class filter media, NIOSH approval number prefix TC-84A. It is recommended that you require that respirator wearer be fit tested and trained in the use, maintenance, and limitations of the respirator.

Discard clothing and other absorbent material 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 exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS STATEMENT

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirement may be reduced or modified as specified in the WPS.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

Flaggers supporting aerial application must use an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(5)] for dermal protection. In addition, flaggers must wear long-sleeved shirt, long pants, shoes and socks.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing / PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing
- 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.

ENVIRONMENTAL HAZARDS

For terrestrial uses, do not apply directly to water, or to areas where surface is present, or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment wash waters. Do not apply when weather conditions favor drift from the target area. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame. In case of spillage, cover with an absorbent such as soda ash, lime, clay, or sawdust. Sweep up and bury. Wash area thoroughly with detergent and water.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in 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. Only protected handlers may be in the area during application. For any requirements specific to you State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, an greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material

GENERAL INFORMATION

Redi-Pik 1.5EC is a defoliant to be used as a pre-harvest aid for cotton. Redi-Pik 1.5EC Cotton Defoliant performs well under both cool and warm weather conditions.

USE PRECAUTIONS

Do not apply this product through any type of irrigation system.

Rainfall within 12 hours after application can reduce effectiveness of Redi-Pik 1.5EC Cotton Defoliant.

Do not feed foliage from treated cotton plants or gin trash to livestock

Do not plant the following crops **earlier than** the specified periods after application of Redi-Pik 1.5EC Cotton Defoliant.

Small grains, sorghum, corn, or root crops (except carrots, onions)	Two (2) months
Legumes (including alfalfa) or leafy vegetables (except lettuce)	Two (2) months
Cole crops, garlic, safflower, tomatoes, and watermelons	Two (2) months
Carrots	Three (3) months
Onions	Four (4) months
Cantaloupe, honeydew melon/casaba melon, muskmelon, or peppers	Five (5) months
Lettuce	
With deep-plowing of soil (12-15 inches)	Two (2) months
When soil is only disced (4-6 inches)	Nine (9) months

Cover Crops: small grains and / or legumes intercropped within the cotton crop to which Redi-Pik 1.5EC Cotton Defoliant will be applied may **only** by use as cover crops and may not be harvested for food or feed. Small grains and/or legumes planted earlier than two (2) months following Redi-Pik 1.5EC application may **only** be used as cover crops and may not be harvested for food or feed.

Do not plant any other rotational crops (except those specified above) within one year of application of Redi-Pik 1.5EC.

Do not use immature crops for food or feed.

Do not allow spray drift to contact trees or crops other than the target crop of mature cotton, or cotton you desire to defoliate, as this product may injure or defoliate other crops.

Particular care should be taken when applying Redi-Pik 1.5EC adjacent to lettuce, citrus, or cantaloupe.

Spray Drift Management: Apply with medium or coarser (according to ASAE standard 572) for standard nozzles.

Additional requirements for ground applications: When applying to crops, apply with nozzle height no more than 2 feet above the ground or crop canopy. When applying to noncrop areas, use lowest nozzle height consistent with safety and efficacy. Direct spray into target vegetation.

Additional requirements for aerial applications: The spray boom should be mounted on the aircraft so as to minimize drift caused by wing tip vortices. The boom length must not exceed 75% of the wing span or 90% of rotor blade diameter. Use upwind swath displacement. When applying to crops, do not release spray at a height greater than 6 to 10 feet above the ground or crop canopy. Do not apply by air if sensitive non-target crops are within 100 feet of the application site.

PRACTICES TO LOWER POTENTIAL FOR DRIFT ONTO NON-TARGET CROPS

During applications, particularly under windy conditions, Redi-Pik 1.5EC Cotton Defoliant may drift to nontarget crops. To help reduce the drift potential, use the following practices:

- Do not apply Redi-Pik 1.5EC by ground or air when wind speeds exceed ten (10) miles per hour at the time of application. Follow local recommendations if wind speeds of less than ten (10) miles per hour are specified in those recommendations
- Use of low nozzle pressure (20-30 psi) is recommended
- Do not apply Redi-Pik 1.5EC when a temperature inversion is present or when conditions favor an inversion prior to completing application(s).
- Additionally, do not apply Redi-Pik 1.5EC by air within one-half (1/2) mile of lettuce. Do not apply Redi-Pik 1.5EC by ground equipment within 100 feet of lettuce.

PRACTICES TO LOWER DRIFT POTENTIAL ONTO NONTARGET CROPS IN THE RIO GRANDE VALLEY OF TEXAS

To help reduce the drift potential, use the following practices:

- Do not apply Redi-Pik 1.5EC Cotton Defoliant by ground or air when wind speeds exceed ten (10) miles per hour at a time of application. Follow local recommendations if wind speeds of less than ten (10) miles per hour are specified in those recommendations.
- Use of low nozzle pressure (20-30 psi) is recommended.
- Do not apply Redi-Pik 1.5EC when a temperature inversion is present or when conditions favor an inversion prior to completing applications.
- Use the largest nozzle orifice possible which permits proper deposition and coverage of product.
- In addition, for citrus crops, do not apply Redi-Pik 1.5EC by air when citrus in flush is within five (5) miles downwind of the point of application. Do not apply Redi-Pik 1.5EC by ground when citrus in flush is within one-half (1/2) mile downwind of the point of application.

TIME OF APPLICATION

Apply Redi-Pik 1.5EC only to mature cotton plants when the last boll you expect to harvest is mature. A boll can be described as "mature" when it is too hard to be dented when squeezed between thumb and fingers, is difficult to slice with a sharp knife, and/or when seeds cut in cross sections have fully developed cotyledons, as evidenced by an absence of jelly within the seed.

Apply Redi-Pik 1.5EC at least 5 days prior to anticipated harvest.

PRECAUTION: The addition of adjuvant can cause desiccation and/or leaf freezing during periods of high temperature. The use of compounds that desiccate leaf tissues is not recommended.

Use of Redi-Pik 1.5EC Cotton Defoliant under extremely cool or adverse condition can result in less than desirable defoliation and/or growth inhibition.

APPLICATION

Redi-Pik 1.5EC Cotton Defoliant may be applied by air or ground equipment. Apply specified dosages in 10-25 gallons of spray per acre with ground equipment or 2-10 gallons per acre by aircraft.

DOSAGE

Apply Redi-Pik 1.5EC Cotton Defoliant at a rate of 0.4 to 1.0 pint of formulated product per acre prior to harvest (see *Application Rate Table*). At some locations, following the initial Redi-Pik 1.5EC application, it may be necessary to make a second application of Redi-Pik 1.5EC (**DO NOT** exceed 1.0 pint/acre per season), or an application of a standard defoliant.

MIXING INSTRUCTIONS

Fill the spray tank with one-half of the required amount of water. Add the proper amount of Redi-Pik 1.5EC Cotton Defoliant and start the spray tank agitator. Finish filling the tank with the balance of water needed. Maintain sufficient agitation during both mixing and application to ensure uniformity of the spray mixture.

**PRECONDITIONING
FOR USE IN CALIFORNIA ONLY**

Redi-Pik 1.5EC may be used as a pre-conditioner to enhance the activity of a defoliant application. Apply Redi-Pik 1.5EC at 4-6 oz. formulated product per acre. Apply in 10-25 gallons of water per acre by ground or 2-10 gallons of water per acre by aerial application. Timing of application is recommended 7-10 days prior to a defoliation application of Redi-Pik 1.5EC (see Application Rate Table) or the use of another defoliant. Refer to the second product label prior to use for complete recommendations.

REDI-PIK 1.5EC COTTON DEFOLIANT APPLICATION RATE TABLE		
To Achieve an Application Rate of:	Use This Amount of Redi-Pik 1.5EC	At the Indicated Rate, One Gallon of Redi-Pik 1.5EC Will Treat:
0.075 lbs. ai/ Acre	0.4 pts. /A (6.4 oz. /A)	20 Acres
0.10 lbs. ai/Acre	0.55 pts. / A (8.8 oz. /A)	15 Acres
0.15 lbs. ai/Acre	0.8 pts. / A (12. 8 oz. /A)	10 Acres
0.1875 lbs. ai/Acre	1.0 pts. / A (16.0 oz. /A)	8 Acres

DO NOT APPLY MORE THAN 1.0 PINT OF REDI-PIK 1.5EC PER ACRE PER SEASON.

CLEANOUT INSTRUCTIONS

Do not allow the spray solution to dry in the application equipment. Immediately following application, clean all equipment (mix tanks, pumps, transfer lines, application tanks, sumps, booms, nozzles and all related equipment) thoroughly with cleaner and water. Contact Nations Ag II for additional information regarding tank cleaners which may be helpful in removing fresh residues.

Should small quantities of Redi-Pik 1.5EC Cotton Defoliant remain in inadequately cleaned equipment, they may be released during subsequent applications and may cause damage to crops. Nations Ag II accepts no liability for damage to crops due to inadequately cleaned equipment.

IMPORTANT: Read the information below using this product. If the terms are not acceptable, you should return the unopened product container immediately for a complete refund.

Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxic Coalition, et. al. v. EPA, C01-0132C, (W.D.WA). For further information, please refer to <http://www.epa.gov/espp/wtc>.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container and keep closed. Store in a cool, dry place. Do not use or store near heat or open flame. Do not contaminate food or foodstuffs.

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: 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.

DO NOT REUSE EMPTY CONTAINER

LIMITATION OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully.

However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Makhteshim Agan of North America, Inc. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Makhteshim Agan of North America, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Makhteshim Agan of North America, Inc. disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, 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 Makhteshim Agan of North America, Inc.'s election, the replacement of product.

Redi-Pik 1.5EC Cotton Defoliant (66222-137)(EPA app 5-14-07)(PBN change to EPA 6-13-07)