

66330-344

8-25-2006

4/10

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98



EPA

United States  
Environmental Protection Agency  
Washington, DC 20460

- Registration
- Amendment
- Other:

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number <b>66330-344</b>	2. EPA Product Manager <b>JOANNE MILLER</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>THIDIAZURON-DIURON SC</b>	PM# <b>23</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Arysta LifeScience North America Corporation 15401 Weston Parkway, Suite 150 Cary, NC 27513</b> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

- Amendment - Explain below.
- Resubmission in response to Agency letter dated \_\_\_\_\_
- Notification - Explain below.
- Final printed labels in response to Agency letter dated \_\_\_\_\_
- "Me Too" Application
- Other - Explain below

**NOTIFICATION**

**AUG 25 2006**

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of alternate brand name, non-pesticidal claim, typographical error correction and change in emergency telephone numbers per PR Notice 98-10. 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 of 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 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"/> On Label <input type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

Section - IV

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

Name <b>Bill Washburn</b>	Title <b>Regulatory Affairs Manager</b>	Telephone No (Include Area Code) <b>901-432-5118</b>
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Certification

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 <b>Regulatory Affairs Manager</b>
4. Typed Name <b>Bill Washburn</b>	5. Date <b>July 24, 2006</b>

*SIG*

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NOTIFICATION

AUG 25 2006



# ADIOS

## COTTON DEFOLIANT

For Agricultural Use Only

<b>ACTIVE INGREDIENTS:</b> Thidiazuron: N-phenyl-N'-1,2,3-thidiazol-5-ylurea*.....	12%
Diuron: 3-(3,4-dichlorophenyl)-1,1-dimethylurea*.....	6%
Other Ingredients:.....	82%
<b>TOTAL</b>	<b>100%</b>

Contains 1 lb. Thidiazuron per gallon and 0.5 lb. Diuron per gallon

**KEEP OUT OF REACH OF CHILDREN  
CAUTION - PRECAUCION**

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.)

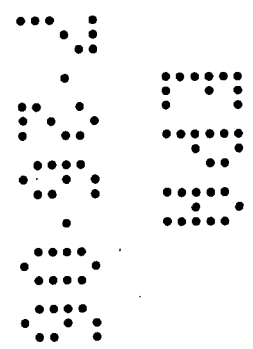
FIRST AID	
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<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.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</b>	
HOT LINE NUMBER	
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment.  <b>FOR 24- HOUR EMERGENCY MEDICAL ASSISTANCE CALL: 1-866-303-6952</b>  <b>FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300</b></p>	

**SEE INSIDE (SIDE PANEL) FOR ADDITIONAL PRECAUTIONS AND USE DIRECTIONS**

EPA Reg. No. 66330-344  
AD071306

EPA Est. No. 34704-MS-001  
NET CONTENTS: \_\_\_\_\_

Manufactured for  
Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513



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

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

**PERSONAL PROTECTIVE EQUIPMENT**

**Applicators and other handlers (other than mixers and loaders) must wear:**

- Coveralls worn over long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or butyl rubber gloves
- Chemical-resistant footwear plus socks
- Protective eyewear

**Mixers and loaders must wear:**

- Coveralls worn over long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or butyl rubber gloves
- Chemical-resistant footwear plus socks
- Protective eyewear

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. 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 requirements may be reduced or modified as specified in the WPS.

**USER SAFETY RECOMMENDATIONS**

**Users should:**

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing 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**

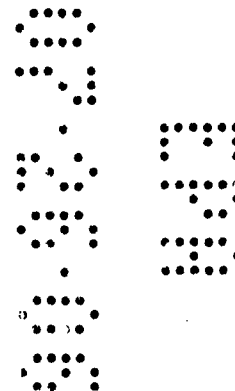
Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters. Do not apply when weather conditions favor drift from treated areas.

**GENERAL INFORMATION**

ADIOS is a harvest aid for cotton, used for leaf removal prior to harvest. ADIOS can be applied in most weather conditions, both warm and cool.

**USE PRECAUTIONS**

This product is not to be applied through any type of irrigation system. Effectiveness of ADIOS will be reduced if rainfall occurs within 12 hours post application. Foliage from treated plants or gin trash is not to be fed to livestock.



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**Rotation to the following crops requires the minimum specified periods below after the last application of ADIOS:**

- small grains, sorghum, corn, or root crops (except carrots, onions).....two (2) months
- legumes (including alfalfa) or leafy vegetable (except lettuce).....two (2) months
- cole crops, garlic, safflower, tomatoes, and watermelon.....two (2) months
- carrots.....three (3) months
- onions.....four (4) months
- cantaloupe, honeydew melon/casaba melon, muskmelon, or peppers .....five (5) months
- lettuce..... when soil has been deep-plowed (12-15 inches) .....two (2) months
- OR lettuce ..... when soil is only disced (4-6 inches) ..... nine (9) months
- All other crops.....twelve (12) months

**Special Note for inter-cropped grains and legumes** planted either as cover crops or planted into treated fields before the minimum two (2) month plant back time after the final ADIOS application: Any such crops are prohibited for use as feed or food and may be used only as cover crops.

Immature crops should not be used for food or feed.

**Prevent spray drift from contacting crops other than mature cotton, since this product may defoliate or injure other plant species.**

Mixtures with organophosphates can increase nontarget crop phytotoxicity. Additional care should be exercised when lettuce, citrus, cantaloupes or any other edible crops are adjacent to ADIOS treated cotton fields.

**PROCEDURES TO LOWER SPRAY DRIFT POTENTIAL ONTO NONTARGET CROPS**

Under windy weather conditions, applications of ADIOS may drift to non-target crops.

The following procedures can help reduce the potential for drift:

- If wind speeds top ten (10) miles per hour at the application site, do not make aerial or ground applications of ADIOS.
- Nozzle pressure of 20-30 psi is recommended.
- Do not apply this product during a temperature inversion because drift potential is high. In addition, do not apply this product if the development of a temperature inversion appears likely during the application period.
- This product should not be applied by ground within 100 feet or by air within 0.5 mile of lettuce.

**RIO GRANDE VALLEY OF TEXAS PROCEDURES TO LOWER SPRAY DRIFT POTENTIAL**

The following procedures can help reduce the potential for drift:

- If wind speeds top ten (10) miles per hour at the application site, do not make aerial or ground applications of ADIOS. If wind speeds are less than ten (10) miles per hour, observe local recommendations from your State Extension Cotton Specialist.
- Nozzle pressure of 20-30 psi is recommended.
- Do not apply this product during a temperature inversion because drift potential is high. In addition, do not apply this product if the development of a temperature inversion appears likely during the application period.
- The maximum nozzle orifice size that provides proper coverage and deposition of this product should be used.
- **CITRUS AREAS:** This product should not be applied by ground within 0.5 mile or by air within 5 miles upwind of citrus in flush.

**DIRECTIONS FOR USE**

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

Do not make applications of this product that may contact workers or other person either by drift or directly. Protected handlers only are allowed in the area during application. Consult your State or Tribe agency responsible for pesticide regulations for any specific recommendation.

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### 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, and 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 statement on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

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 worn over long-sleeved shirt and long pants
- Chemical-resistant gloves such as barrier laminate or butyl rubber gloves
- Chemical-resistant footwear plus socks
- Protective eyewear

### TIME OF APPLICATION

ADIOS applications are to be made only on mature cotton plants when the uppermost harvestable boll is mature. Boll maturity is defined as 1) when a boll is squeezed between thumb and finger, it does not dent; 2) when cutting a cross section with a sharp knife is difficult; 3) when seeds in cross section lack liquid within the seed coat or outer edges of seed coat are light brown; and 4) when fully developed cotyledons are present.

Make applications of ADIOS at least 5 days prior to expected harvest date.

**NOTE:** Adequate defoliation with ADIOS depends on three factors:

- Cotton is actively growing.
- High relative humidity.
- Cotton plant leaves are turgid and not desiccated.

**ATTENTION:** Desiccation and/or leaf freezing may occur during periods of high temperature when adjuvants are added to ADIOS application solution. Products and adjuvants known to cause desiccation of cotton leaf tissue should not be used.

Under low nighttime temperatures (below 60°F) or otherwise adverse conditions, this product, when used alone, may provide less than expected defoliation and / or regrowth suppression.

### APPLICATION INFORMATION

Use an adequate volume of water with the recommended amount of ADIOS to uniformly and completely cover leaves. For ground equipment, apply 10 – 25 gallon per acre and by air, use 2 –10 gallons per acre. Maintain agitation during application.

### DOSAGE INFORMATION

Application Rate: Before harvest, use 0.4-1.0 pints active ingredient/acre (6.4-16 fl. oz./A).

One gallon of ADIOS will treat 8 - 20 acres. Refer to the dose rate table below.

In some situations, a follow-up application may be needed. ADIOS may be used for this application. Other defoliant may be needed. If additional boll opening is required, Ethephon 6 or any other boll-opening products may be used at recommended rates; see product label for rates and timings. Consult your local State Extension Cotton Specialist recommendations for rates and timings.

The maximum annual use rate of ADIOS is 16 oz. per acre per season.

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### MIXING INSTRUCTIONS

1. Fill spray applicator tank with at least one half of the water to be used
2. Start agitation
3. Add the appropriate volume of ADIOS
4. Continue agitation and fill tank with the remainder of the water to be used
5. Agitation should continue throughout the application

### CALIFORNIA ONLY: PRECONDITIONING

When used as a pre-conditioner seven to ten days before application of this or other defoliant compounds, this product will improve the efficacy of such a defoliant application. Before use, observe all product label directions, recommendations and prohibitions on both product's labels.

Application Rate: Use 4-6 fl.oz. of this product/acre in an aerial application of 2-10 gallons of spray solution or ground application of 10-25 gallons of spray solution

**APPLICATION RATE TABLE for ADIOS**

<b>ADIOS Formulated Product</b>	<b>One Gallon of ADIOS Will Treat</b>	<b>Active Ingredients per Acre</b>
6.4 oz./Acre (0.4 pt./Acre)	20 Acres	0.075 lbs. ai/Acre
8.8 oz./Acre (0.55 pt./Acre)	15 Acres	0.10 lbs. Ai/Acre
12.8 oz./Acre (0.8 pt./Acre)	10 Acres	0.15 lbs. Ai/Acre
16.0 oz./Acre (1.0 pt./Acre)	8 Acres	0.1875 lbs. ai/Acre

**DO NOT APPLY MORE THAN 1.0 PINT OF ADIOS PER ACRE PER SEASON.**

### IMPORTANT CLEANOUT INSTRUCTIONS

When applying ADIOS, a residue may form in application equipment. This residue can best be flushed out of the spraying system by using a commercial tank cleaner when done while residue is still fresh and moist. **DO NOT ALLOW EQUIPMENT TO DRY BEFORE CLEANOUT.** Consult your State Extension Cotton Specialist for recommended tank cleaners and cleaning procedures.

Tank cleaner and water should be used immediately after application. The entire system including nozzles, booms, application tanks, sumps, pumps, and transfer lines should be flushed. Allowing the spray solution to dry in the application equipment can result in residues that are more difficult to remove. **Dried residues are extremely difficult to remove. To remove such dried residues, fill the affected equipment to capacity with commercial tank cleaner solution and let it remain for 7 days. Afterwards, the equipment will need to be thoroughly flushed and rinsed.**

Spray application equipment that has been inadequately cleaned will contain residue of ADIOS. Such improper cleaning could lead to crop damage in later applications.

**Arysta LifeScience North America Corporation assumes no liability due to equipment that has not been properly cleaned.**

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### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store this product in a cool, dry place in its original container only. Container should be closed when not in use. Do not expose the product to open flame excessive heat. Store in original container and keep closed.

**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.

**To Contain a Spill:** Absorb liquid by covering it with cat litter, commercial clay, lime, sand, sawdust, or soda ash. Once absorbed, bury the cleaning materials and cleanse the spill area with a detergent and water solution.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent); then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or by other procedures approved by State and local authorities.

### DO NOT REUSE EMPTY CONTAINER

### CONDITIONS OF SALE AND WARRANTY

The **Directions For Use** of this product reflects the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with 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 use of the product in a manner inconsistent with its labeling, all of which are beyond the control of ARYSTA LIFESCIENCE NORTH AMERICA COPORATION ("ALSNA") or the Seller. All such risks shall be assumed by the Buyer.

ALSNA 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.

ALSNA MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT PERMITTED BY LAW, ALSNA AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALSNA 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 ALSNA.



**COTTON DEFOLIANT**  
For Agricultural Use Only

**ACTIVE INGREDIENTS:**

Thidiazuron: N-phenyl-N'-1,2,3-thiadiazol-5-ylurea*.....	12%
Diuron: 3-(3,4-dichlorophenyl)-1,1-dimethylurea*.....	6%
Other Ingredients:.....	82%
<b>TOTAL</b> .....	<b>100%</b>

Contains 1 lb. Thidiazuron per gallon and 0.5 lb. Diuron per gallon

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION - PRECAUCION**

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 SWALLOWED**

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 person sip a glass of water if able to swallow.  
Do not give anything by mouth to an unconscious person

**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.  
Call a poison control center or doctor for treatment advice

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

**HOT LINE NUMBER**

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

**FOR 24- HOUR EMERGENCY MEDICAL ASSISTANCE CALL: 1-866-303-6952**  
**FOR CHEMICAL EMERGENCY:** Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

**SEE ATTACHED BOOKLET FOR ADDITIONAL PRECAUTIONS AND USE DIRECTIONS**

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

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco..

**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 by cleaning of equipment or disposal of equipment washwaters. Do not apply when weather conditions favor drift from treated areas.

**DIRECTIONS FOR USE**

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

Do not make applications of this product that may contact workers or other person either by drift or directly. Protected handlers only are allowed in the area during application. Consult your State or Tribe agency responsible for pesticide regulations for any specific recommendation.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.  
**PESTICIDE STORAGE:** Store this product in a cool, dry place in its original container only. Container should be closed when not in use. Do not expose the product to open flame excessive heat. Store in original container and keep closed.  
**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.  
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**DO NOT REUSE EMPTY CONTAINER**

EPA Reg. No. 66330-344  
EPA Est. No. 34704-MS-001

Manufactured for  
Arysta LifeScience North America  
Corporation

AD071306  
NET CONTENTS: \_\_\_\_\_

15401 Weston Parkway, Suite 150  
Cary, NC 27513

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Arysta LifeScience

9/10

July 24, 2006

NOTIFICATION

AUG 25 2006

Ms. Joanne Miller, PM 23  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs – 7504P  
U.S. Environmental Protection Agency  
One Potomac Yard (South Building)  
2777 S. Crystal Drive  
Arlington, VA 22202

**Subject: Thidiazuron-Diuron SC  
EPA reg. No. 66330-344**

**Notification for Alternate Brand Name and Others**

Dear Ms. Miller:

Per PR Notice 98-10, we are notifying the Agency to the changes in the subject label outlined below:

**Alternate Brand Name** – the subject product will be marketed and sold under the alternate brand name “*ADIOS*”.

**Non-Pesticidal Claim** – this product will be marketed with the “**Harvest Smart Science**” logo on the label and package.

**Typographical Error** – the Spanish signal word “**PRECAUCION**” was omitted from the original label. The Spanish advisory language was incorporated on the front panel without the proper signal word. This notification corrects that omission.

**Consumer Access Numbers** – the change in ownership from Micro Flo to Arysta LifeScience requires the change in emergency telephone numbers as shown on the enclosed labels.

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 of 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,

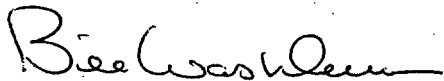
10/10

this may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Enclosed you will find two copies of the subject label, one with the changes highlighted; the other is a clean copy. Please provide proof of your acceptance of this notification by stamping the extra copy of this letter and returning in the self-addressed stamped envelope provided.

If we can be of any assistance in the processing of this notification, please do not hesitate to contact the undersigned at 901-432-5118.

Sincerely,



Bill Washburn  
Regulatory Affairs Manager

Enclosures