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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAR 5 2008

Ms. Carrie M. Tackema
Regulatory Affairs Specialist
Cheminova Inc.
1700 Route 23, Suite 300
Wayne, NJ 07470

Subject: Supplemental Label for Boll Weevil Eradication Program
Fyfanon ULV AG
EPA Reg. No. 67760-35
Application Dated December 11, 2007

Dear Ms. Tackema:

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided the label is corrected as cited below. Submit one copy of your final printed label incorporating the following correction before the supplemental label is released for use with the subject product.

1. Since the added statement "Application will not be made to wet foliage" is not an-EPA-mandated prohibition, it must be revised to reflect its advisory nature. Wording such as the following would be acceptable: Cheminova does not recommend that application be made to wet foliage.

2. Revise the section headed "Use Precautions for Aerial Application to Cotton to Control Plant Bugs and Stinkbugs" as described below.

a. Remove the text "Use Precautions". It is not appropriate for the section since it contains only advisory statements. More appropriate headings would be Aerial Application to Cotton to Control Plant Bugs and Stinkbugs or Additional information for Aerial Application to Cotton to Control Plant Bugs and Stinkbugs.

b. Revise the first sentence in this section so that it is clear that if the additional pesticide is used, all the label application directions, restrictions and precautions for both the referenced pyrethroid and the subject product must be followed. The wording cited below would be acceptable.

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Fyfanon[®] ULV

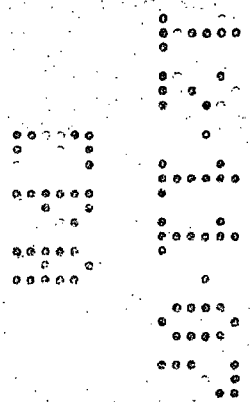
INSECTICIDE

SUPPLEMENTAL LABEL

ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAR 5 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
As amended, for the pesticide
Registered under EPA Reg. No.
67760-35

EPA Reg. No. 67760-35

KEEP OUT OF REACH OF CHILDREN
CAUTION



DIRECTIONS FOR USE

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

Read the entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and federal regulations.

IN CASE OF A MEDICAL EMERGENCY INVOLVING THIS PRODUCT, CALL TOLL FREE, DAY OR NIGHT, 1-866-303-6950

Use Directions

Crop	Pests controlled	Fl. oz/acre	Comments	Pre-harvest interval
Cotton	Boll Weevils	8 - 16 16	Early to midseason Late season	0
Cotton	Tarnished Plant Bug	16	Apply After Flowering Commences	0
Cotton	Stink Bug	16	Apply at Action Threshold Levels	0

For use on cotton: Fyfanon ULV can be used alone as a Fyfanon ULV concentrate spray or diluted in refined cottonseed or vegetable oil sufficient to make at least one quart of finished spray per acre. Do not use petroleum based-oils as a substitute for vegetable oils.

USE PRECAUTIONS FOR APPLICATION TO COTTON TO CONTROL BOLL WEEVIL

Treatment supervisors and applicators must be aware of all sensitive areas near cotton fields, including: schools, hospitals, nursing homes, churches, occupied dwellings, parks, recreation areas, bodies of water, and potential habitat for threatened and "endangered species."

"For aerial applications, spray equipment must be adjusted so that the volume median diameter is 100 microns ($Dv\ 0.5 = 100\mu m$) or greater (very fine or coarser spray) according to ASAE S572. The effects of flight speed, nozzle angle and type, and pump pressure on the droplet size spectrum must be considered."

"For aerial applications, the spray boom should be mounted on the aircraft as to minimize drift caused by wingtip or rotor vortices. The minimum practical boom length should be used and outermost nozzles must not be placed beyond 75% of the wingspan or rotor diameter."

"Spray should be released at the lowest height consistent with pest control and flight safety. Applications more than 10 feet above the crop canopy should be avoided."

"Global positioning systems (GPS) should be used to guide pilots and to monitor each application."

"Ground equipment should utilize a controlled air flow to facilitate particle size and spray deposition, and should be used at a vehicle speed of 4 to 10 mph. Spray equipment must be adjusted so that the volume median diameter is 100 microns ($Dv\ 0.5 = 100\mu m$) or greater."

"Ground equipment should be used to treat field edges when possible, covering areas that can not be treated effectively with aircraft because of obstructions which may affect applicator safety, or where there is boll weevil over-wintering habitat adjacent to the treatment area, or if there are adjacent sensitive areas."

"Do not apply when wind velocity exceeds 10 mph. Treatments should be applied when winds are calm, or moving away from adjacent sensitive areas."

"When applications are made with a cross-wind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of the application area by adjusting the path of the aircraft upwind."

"Do not make aerial or ground applications into temperature inversions. Inversions are characterized by stable air and increasing temperatures with height above the ground. Mist or fog may indicate the presence of an inversion in humid areas. The applicator may detect the presence of an inversion by producing smoke and observing a smoke layer near the ground surface."

"Applications will not be made when people are in or near infested cotton fields or, to the degree possible, when people are present in or near adjacent sensitive areas."

"Application will not be made when rainfall is imminent."

"Application will not be made to wet foliage."

"Before beginning treatment, program personnel shall notify all registered apiarists in or near the treatment area of the date and approximate time of treatment."

USE PRECAUTIONS FOR AERIAL APPLICATION TO COTTON TO CONTROL PLANT BUGS and STINKBUGS

"In the presence of a high population of tarnished plant bug nymphs, a pyrethroid labeled for ULV application should be added at the recommended rate and applied in accordance with label specifications for both products."

"For best results, all applications should be made in accordance with local extension

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recommendations and follow insect resistance management guidelines. Sequential applications of Fyfanon are not recommended. Rotate to other products for at least one application before re-applying a Fyfanon treatment.

THIS LABEL MUST BE IN THE POSSESSION OF THE USER AT THE TIME OF APPLICATION. PLEASE REFER TO CONTAINER LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS. IN ADDITION TO THE RESTRICTIONS LISTED HERE, THE USER MUST FOLLOW ALL APPLICATION DIRECTIONS, RESTRICTIONS, AND PRECAUTIONS OTHERWISE LISTED ON THE EPA REGISTERED LABEL.

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