



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division (H7505C)  
401 "M" St., S.W.  
Washington, D.C. 20460

EPA Reg. Number:

Date of Issuance:

70166-8

JUL 10 1998

NOTICE OF PESTICIDE:  
 Registration  
 Reregistration

Term of Issuance:  
Conditional

Name of Pesticide Product:  
NAA 200

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Sundance Ag, Inc.  
P.O. Box 9  
Burley, Idaho 83318

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 registered in accordance with FIFRA sec. 3(c) (7) (A) provided that you:

1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec. 3(c) (5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Any Technical (manufacturing-use) product that is manufactured to be the source of the active ingredient in the subject product, and also the subject product itself, must be produced in an establishment(s) that is(are) registered with the United States Environmental Protection Agency (U.S. EPA).
3. Upon arrival at any United States landing point of any shipment of either a Technical (manufacturing-use) product that is intended to be the source of the active ingredient in the subject product, or any shipment of the subject product itself, if it is formulated outside the United States, the following actions must be taken:
  - a. The shipment must be handled in accordance with all applicable U.S. Customs Service requirements.
  - b. A copy of the Notice of Arrival of the shipment must be sent directly to each of the following U.S. EPA

Signature of Approving Official:

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Date:

JUL 10 1998

employees: 1) the Product Manager who is responsible for the subject product in the U.S. EPA's Office of Pesticide Programs (hereinafter "Product Manager"), and 2) the person who is responsible for overseeing imports of pesticides in the Regional Office of the U.S. EPA that has responsibility for the region of the United States in which the point of arrival of a shipment of one of the types that are specified above is located (hereinafter "Regional Officer").

- c. Sundance Ag, Inc. must also immediately notify the following U.S. EPA employees of the location at which the shipment is or will be stored during the independent laboratory audit: 1) the Product Manager, and 2) the Regional Officer. Until an analysis demonstrates that the shipment meets specifications, the product(s) comprising the shipment may not be further formulated or otherwise altered.
- d. An independent laboratory audit will be performed to determine whether a product(s) in a shipment of the type specified above meets the specifications that are contained in the most recent approved Basic or Alternate Confidential Statement(s) of Formula (CSF). This shall result in the submission to the Agency of a chemical analysis of the product(s) comprising the shipment, including Naphthaleneacetic Acid (NAA), its salts and/or esters, and any impurities that may exist, as outlined in your proposal dated May 18, 1998. The audit will be conducted as follows:
  - I. An independent analysis of the product(s) in the shipment shall be conducted by a laboratory using Good Laboratory Procedures (GLP).
  - ii. Selection of the sample material that is to be analyzed shall be conducted by Stuart A. Turner of Turner and Co., Inc., as identified in your proposal. You must notify the Product Manager of any change in the personnel selecting the samples.
  - iii. The analytical laboratories identified in your proposal as being the ones that will perform the analysis of the samples are Columbia Food Laboratories, Inc. and CIA Labs, Inc. You must notify the Product Manager of any change in laboratories.
  - iv. Analysis of each and every shipment of the type specified above shall be conducted for five (5) years from the date of registration. However, the

U.S. EPA will review this condition of registration after three (3) years and make a determination as to whether the audit should be continued for the remaining two (2) years.

- v. The product(s) in each shipment, as analyzed and including impurities, must agree with the statement of composition that is contained in the most recent U.S. EPA-approved Basic or (if present) Alternate CSF.
- vi. Results of all analyses of the product(s) comprising each shipment of the type specified above and of any retesting that must be performed must be conveyed directly to the following U.S. EPA employees: 1) the Product Manager, and 2) the Regional Manager.
- vii. If the product(s) in the shipment falls within the appropriate specifications, as defined above, Sundance Ag, Inc. may immediately have any and all applicable regulatory impediments to the company's legal use of the shipment that may exist removed, including those relating to the U.S. Customs Service. If one or both of the product(s) in the shipment does not fall within the appropriate specifications, the entirety of the product(s) in the shipment that is determined to be unacceptable must immediately be shipped back to the original manufacturer and may not legally enter channels of trade.

- 4. Make the changes to the label that are listed below before you release the product for shipment:
  - a. In the "AGRICULTURAL USE REQUIREMENTS" box, change the start of the first sentence from "Use this product in accordance with..." to "Use this product only in accordance with..."
  - b. In the first sentence in the fourth paragraph in the "CHEMICAL THINNING - APPLES" SECTION, change "...likely to rise above 50°F..." to "...likely to rise above 60°F...", to agree with a later statement.
  - c. In the "CHEMICAL THINNING - OLIVES" section, add "Severe over thinning may result from application to trees during hot and dry conditions."
  - d. In the "CONTROL OF PREHARVEST DROP IN APPLES AND PEARS" section, delete the second sentence of the first paragraph or revise it to read "Do not tank mix unless

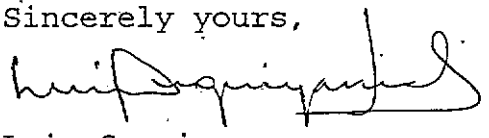
previous experience has proven the combination to be effective and to cause no adverse effects such as fruit marking."

- e. Change the Spanish translation of "CAUTION" to "CUIDADO".
  - f. In the fourth sentence in the first paragraph of the "AGRICULTURAL USE REQUIREMENTS" section, change "...statements on this label and personal protective equipment..." to "...statements on this label about personal protective equipment...".
  - g. In the second sentence in "ENVIRONMENTAL HAZARDS", change "Do not contaminate water by disposing of equipment washwaters." to "Do not contaminate water when cleaning equipment or disposing of equipment washwaters."
  - h. Move the "STORAGE AND DISPOSAL" section to at or near the end of the "DIRECTIONS FOR USE" section.
5. Submit one copy of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,



Luis Suguiyama  
Chief  
Fungicide Branch  
Registration Division (7505C)

Attachments: Product label, stamped "Accepted with Comments"  
A-79 Enclosure

cc w/o attachments: EPA Regions 9 and 10

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated

10 1998

NAA 200

**A HORMONE TYPE PRODUCT FOR THINNING  
APPLES, CITRUS, OLIVES, PEARS AND FOR CONTROL  
OF PREHARVEST DROP OF APPLES AND PEARS**

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

70166-1

**ACTIVE INGREDIENT:**

1-Naphthalene Acetic Acid, Potassium Salt-----6.3%

**INERT INGREDIENTS:** -----93.7%

TOTAL 100.00%

Equivalent to 5.5% 1-Naphthaleneacetic Acid or 200 grams (0.5 lbs.) per gallon.

ALL APPLICABLE DIRECTIONS, RESTRICTIONS, AND PRECAUTIONS ON THE LABEL ARE TO BE FOLLOWED.

Sundance Ag., Inc.  
P.O. Box 9  
Burley, ID 8331

EPA Registration No. 70166-1

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

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand the label, find someone to explain it to you in detail.)

**STATEMENTS OF PRACTICAL TREATMENT**  
If Swallowed: Call a physician or Poison Control Center immediately. Induce vomiting by drinking 1 or 2 glasses of water and touching back of throat. Do not give anything by mouth to an unconscious or convulsing person.  
If Inhaled: Remove to fresh air.  
If On Skin: Wash thoroughly with soap and water.  
If In Eyes: Immediately flush eyes with plenty of water. Get medical attention if irritation persists.

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

Causes eye irritation. Do not get in eyes. Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instruction for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**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.

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**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 disposal of equipment washwaters. Do not contaminate irrigation ditches or water used for irrigation or domestic purposes. Do not apply when conditions favor drift from treated areas. Do not use in a greenhouse.

**STORAGE AND DISPOSAL**

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

**Storage:** Store product in original container in a cool, (not in direct sunlight), dry, locked place out of reach of children. Do not allow product to freeze.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility.  
**Container Disposal:** 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.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a 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 your State or Tribe, consult the agency responsible for pesticide regulation. NAA 200 thin the fruit of apples, pears and certain varieties of citrus and olives to provide an adequate return bloom the following season. NAA 200 controls pre-harvest drop of apples and pears leading to larger harvest and reduction of losses from windfall and knockdown. Do not apply this product through any type of irrigation system.

**AGRICULTURAL USE REQUIREMENTS**

Use this product 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 green-houses 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 and 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
- Waterproof gloves
- Shoes plus socks
- Protective Eyewear

**ALL APPLICABLE DIRECTIONS, RESTRICTIONS, AND PRECAUTIONS ON THE LABEL ARE TO BE FOLLOWED.**

**CONTROL OF PREHARVEST DROP IN APPLES AND PEARS**

For control of preharvest drop optimum effect will be obtained by NOT tank mixing with any other product. If a combination is done, recorded test data must prove the combination to be effective and causing no adverse effects (such as fruit marking).

Consult State Agricultural Experiment Station or County Extension Agency for correct timing of application on apples and pears. Spray trees thoroughly, wetting all fruit, stems and adjacent leaves. NAA 200 becomes effective in 3 to 4 days after application and controls drop for two (2) weeks. Separate sprays should be applied to early and late maturing varieties. Do not make more than 2 applications and do not delay picking beyond optimum maturity. Do not spray within 2 days of harvest. Apply to apples 7 to 14 days prior to harvest and to pears 6 to 7 days prior to harvest.

**Ground Application: Apples, D'Ajou Pears:**

Apply 16 fl. oz to 32 fl. oz of product (25 grams to 50 grams of active ingredient) per acre in sufficient water to ensure good coverage. Under normal conditions the 32 fl. oz rate per acre should be used.

**Ground Application: Pears; Bartlett and Bosc:**

Apply 8 fl. oz to 16 fl. oz of product (12.5 grams to 25 grams of active ingredient) per acre in sufficient water to ensure good coverage. Under normal conditions the 16 fl. oz rate per acre should be used. When Bartlett and Bosc are interplanted make only one application per season. Use a maximum of 16 fl. oz of product per acre per season on Bartlett to prevent pre-mature ripening.

Apply in sufficient water for good even coverage with your specific equipment. Application can be made in as little as 50 gallons of water per acre, up to 400 gallons of water per acre and is highly dependent on type of equipment used and the density of the foliage. Uniform and even distribution of the spray is imperative. If in doubt, contact your Equipment Manufacturer, State Agricultural Experiment Station, or County Extension Agent.

**Dilution for Aerial Application:** Use the rates of product per acre recommended above. Use a minimum of five (5) gallons of spray solution per acre. Application should be made under weather conditions and using equipment favoring minimum drift and uniform distribution of product.

#### CHEMICAL THINNING - APPLES

Because of differences in varieties, climatic factors, tree vigor and fruit set, the application rate for thinning can range from 2.4 fl. oz to 3.2 fl. oz of product (3.75 grams to 5.0 grams active ingredient) per acre. Apply in sufficient water for good even coverage with your specific equipment. Application can be made in as little as 50 gallons of water per acre, up to 400 gallons of water per acre and is highly dependent on type of equipment used and density of the foliage. Uniform and even distribution of the spray is imperative. If in doubt, contact your Equipment Manufacturer, State Agricultural Experiment Station, or County Extension Agent.

Application timing can range from petal fall to 25 days after full bloom. The higher concentrations should be limited to vigorous trees with high fruit set potential; Use the lower concentrations for weaker, less vigorous trees and less food reserves and lower fruit set potential. Use lower rates when a surfactant (wetting agent) is added. Use surfactant (wetting agent) according to manufacturer's recommendations, but not more than 1 pint per 100 gallons of spray.

Mid-season to late blooming varieties such as Red Delicious, Golden Delicious and Romeas should be treated 5 to 21 days after full bloom depending on locality and other factors.

During cool springs, delay application as necessary until the largest fruits are 10 - 15 mm in diameter and forecasted daytime temperatures are likely to rise above 50° F within the next five days. The preferred application temperature is between 70° F and 75° F. Application is not recommended below 60° F or above 80° F. When daytime temperatures exceed 90° F over-thinning may occur. Good thinning can be obtained under the latter conditions with lower rates of chemicals.

**IMPORTANT:** NAA 200 should not be used on early season varieties (those that ripen before Macintosh) such as Yellow Transparent, Early Williams Red and Oldenburg, since severe injury or over-thinning may occur.

#### CHEMICAL THINNING - PEARS - BARTLETT, BOSC AND COMICE

Apply product at a rate of 8 fl. oz to 12 fl. oz of product (13 grams to 19 grams of active ingredient) per acre. Apply in sufficient water for good even coverage with your specific equipment. Application can be made in as little as 50 gallons of water per acre, up to 400 gallons of water per acre and is highly dependent on type of equipment used and density of the foliage. The highest application rate should be applied in a total spray mixture containing 400 gallons per acre and used only when foliage is very dense and over six feet tall. Uniform and even distribution of the spray is imperative. If in doubt, contact your Equipment Manufacturer, State Agricultural Experiment Station, or County Extension Agent.

Make only one application per season 14 to 28 days after full bloom with a surfactant (wetting agent). Do not use on trees with light bloom as over-thinning may result. NAA 200 may not adequately thin Bartlett some seasons. The preferred application temperature is between 70° F and 75° F. Application is not recommended below 60° F or above 80° F. Do not use in concentrated sprays or by aerial application.

#### CHEMICAL THINNING - OLIVES

**TIMING IS CRITICAL** - Spray when young fruits are 1/8 to 3/16 inch in diameter, or 12 to 18 days after full bloom. Thinning is effective on all varieties except Sevillano. Do not apply during bloom unless you wish to remove all your fruit. Apply solution of 120 ppm by adding 28.8 fl. oz. of product and a wetting agent (surfactant) to 100 gallons of water 12 days after full bloom. The spray concentration should be adjusted upward by 10 parts per million for each day following full bloom during the thinning period.

#### FOR USE IN PRESERVING ORNAMENTAL HOLLY BOUGHS

To delay leaf drop of Holly boughs, make a "dip" solution containing 1 to 2 cups (8 to 16 fl. oz) of product in 100 gallons of water (equals 33 - 66 ppm). Dip Holly boughs as soon as possible after cutting. Allow excess solution to drain. Do not soak or leave boughs in dip solution. Replenish dip solution as needed. However, to maintain concentration replace with fresh solution every 3 to 4 days. Package while moist to keep boughs fresh until used. Maintain a 34° F to 40° F temperature in bough storage area.

#### CHEMICAL THINNING - ORANGES, TANGERINES

##### (Mandarins), TANGELOS AND TANGORS

Spray at the rate of 100 to 500 ppm (24 fl. oz. per 100 gal. water equals 100 ppm). The degree of thinning obtained with NAA 200 is highly variable and temperature related. Severe over-thinning may result from application to trees during hot and dry conditions. Do not apply to "non-thrifty" trees. The grower must determine a suitable concentration and time of applications for his cultivars, location and weather condition. Concentrations in the 100 to 150 ppm range should be tried and applications made when the fruit is in an early state of development (5 to 20 mm in diameter) and near the normal period of "June Drop". In Florida the period of natural drop occurs in May. Higher thinning activity should be expected during hot weather. Therefore, lower concentrations should be used during hot weather (95° F and higher) and higher concentrations should be used during cooler and wet weather (85° to 95° F). The effectiveness of NAA 200 diminishes rapidly below 85° F. Do not apply more than 1 application per year. Do not use on varieties where both young and fruits close to maturity are present on tree. Do not apply within 150 days of harvest.

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TANK MIX ADVISORY

Before mixing or applying NAA 200 with any other pesticides, additive, or fertilizer, confirm compatibility with that product by contacting your Dealer, Agricultural Experiment Station, County Extension Agent, or Manufacturer of the product to be mixed.

FOR RATES AND APPLICATION TIMING SPECIFIC TO YOUR VARIETY, CONDITIONS, AND LOCATION, CONSULT YOUR LOCAL EXTENSION AGRONOMIST FOR RECOMMENDATIONS.

**CONDITIONS OF SALE-LIMITED WARRANTY AND LIMITATIONS OF LIABILITY AND REMEDIES**

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions, the failure to follow the label directions, or good application practices, all of which are beyond the control of Sundance Ag., Inc. or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. Sundance Ag., Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of Sundance Ag., Inc. Sundance Ag., Inc. makes no other warranties or representations of any kind, express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose. The exclusive remedy against Sundance Ag., Inc. for any cause of action relating to the handling or use of this product is a claim of damage and in no event shall damages or any other recovery of any kind against Sundance Ag., Inc. exceed the price of the product which causes the alleged loss, damage, injury, or other claim. Sundance Ag., Inc. shall not be liable and any and all claims against Sundance Ag., Inc. are waived, for special, indirect, incidental, or consequential damages or expense, of any nature, including, but not limited to, loss of profits or income, whether or not based on Sundance Ag., Inc., negligence, breach of warranty strict liability in tort or any other cause of action. Sundance Ag., Inc. and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.