

70506-33

03-31-2004

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Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98

| | | | |
|--|---------------------------------|-------------------------------------------|---------------------------------|
| | United States | <input type="checkbox"/> Registration | OPP Identifier Number 274767 |
| | Environmental Protection Agency | <input type="checkbox"/> Amendment | |
| | Washington, DC 20460 | <input checked="" type="checkbox"/> Other | |

Application for Pesticide - Section I

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| 1. Company/Product Number United Phosphorus Inc./70506-33 | 2. EPA Product Manager J. Tompkis | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) United Phosphorus, Inc/ Devrinol 2-G Ornamental Herbicide | PM # 25 | |
| 5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 423 Riverview Plaza Trenton, NJ 08611 <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

| | | |
|--------------------------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------|
| <input type="checkbox"/> Amendment - Explain below | <input type="checkbox"/> Final printed labels in response to | NOTIFICATION MAR 3 1 2004 |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application | |
| <input checked="" type="checkbox"/> Notification - Explain below | <input type="checkbox"/> Other - Explain below | |

Explanation: (For Section I and Section II.) 1. Storage & disposal section revised per EPA's Label Review Manual to add the option of marketing in plastic containers; exact wording is from EPA's Label Review Manual so no amendment is required for this revision. 2. Added 10.5 lb as alt. container size on master & sub labels. 3. Added "Engineering Control Statement" heading to master label which was missing in previous version. 4. Removed the phrase "24-Hours" from the Hotline Number.

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 U.S.C. 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: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Metal | <input type="checkbox"/> Plastic |
| *Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt. | No. per container |
| 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 Label accompanying product | |
| 6. Manner in Which Label is Affixed to Product | | | <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | <input type="checkbox"/> Other _____ | |

Section IV

| | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------|--|---------------------------------------------------|-----------------------------------------------|
| 1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) | | | | | |
| Name Rebecca A. Clemmer | | Title Regulatory Affairs Manager | | Telephone No. (Include Area Code) 609-392-8200 | |
| 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 Regulatory Affairs Manager | | | |
| 4. Typed Name Rebecca A. Clemmer | | 5. Date March 22, 2004 | | | |

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NOTIFICATION

MAR 3 1 2004



DEVIRINOL® 2-G ORNAMENTAL
Selective Herbicide

A Preemergence Herbicide for Weed Control in Home Flower Gardens and Landscape Plantings. Use in Deciduous and Evergreen Trees and Shrubs, Ground Covers, Perennial Flowers, Fruit and Nut Crops, Container Grown Plants, and Turfgrass

ACTIVE INGREDIENT:

Napropamide..... 2.0%

INERT INGREDIENTS:..... 98.0%

TOTAL..... 100.0%

Contains 2 Pounds of Active Ingredient per 100 Pounds

EPA Reg. No.: 70506-33
EPA Est. No.:

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR STATEMENT OF PRACTICAL TREATMENT AND PRECAUTIONARY STATEMENTS

Made in U.S.A.

Marketed by:
United Phosphorus, Inc.
423 Riverview Plaza
Trenton, New Jersey 08611
1-800-247-1557
www.upi-usa.com

NET CONTENTS: 7 lbs., 10.5 lb

KEEP OUT OF REACH OF CHILDREN

CAUTION

| FIRST AID | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| If on skin or clothing | <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of 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 slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• 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">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person. |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. | |
| HOT LINE NUMBER | |
| For Medical Emergency Assistance (Human or Animal) call the National Pesticide Information Center 1-800-858-7378. For chemical emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300. | |

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid contact with skin, eyes and clothing. May be harmful if swallowed. Do not breathe dust. Avoid contamination of food and feed.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical resistant gloves made of any waterproof material such as Barrier Laminate, Nitrile Rubber (≥ 14 mils), Neoprene rubber (≥ 14 mils) or Viton (≥ 14 mils).
- Shoes plus socks.

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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.

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 when cleaning equipment or disposing of equipment wash waters.

GENERAL PRECAUTIONS

- Read all instructions before using.
- Use only for recommended purposes and at recommended rates.
- Do not overdose.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Apply this product as specified on this label.

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.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter or allow others to enter the treated areas until dusts have settled.

WHAT THIS PRODUCT DOES

DEVIRINOL 2-G ORNAMENTAL controls certain annual grassy and broadleaf weeds as they germinate. It does not control established weeds. The weeds controlled are listed below:

| WEEDS CONTROLLED BY DEVIRINOL 2-G ORNAMENTAL | |
|-----------------------------------------------------|--------------------------|
| ANNUAL GRASSES: | |
| Barnyardgrass, Junglerice | <i>Echinochloa</i> spp. |
| Wild Barley | <i>Hordeum leporinum</i> |
| Annual Bluegrass | <i>Poa annua</i> |

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WEEDS CONTROLLED BY DEVIRINOL 2-G ORNAMENTAL

| | |
|--------------------------------|-------------------------------|
| Bromes | <i>Bromus</i> |
| Cheatgrass | <i>B. secalinus</i> |
| Downy Brome | <i>B. tectorum</i> |
| Ripgut Brome | <i>B. rigidus</i> |
| Soft Chess | <i>B. mollis</i> |
| Large (Hairy) Crabgrass | <i>Digitaria sanguinalis</i> |
| Smooth Crabgrass | <i>Digitaria ischaemum</i> |
| Southwestern Cupgrass | <i>Eriochloa gracilis</i> |
| Foxtails | <i>Setaria</i> |
| Bristly Foxtail | <i>S. verticilla</i> |
| Giant Foxtail | <i>S. faberi</i> |
| Green Foxtail | <i>S. viridis</i> |
| Yellow Foxtail | <i>S. lutescens</i> |
| Goosegrass | <i>Eleusine indica</i> |
| Seedling Johnsongrass | <i>Sorghum halepense</i> |
| Wild Oats | <i>Avena fatua</i> |
| Panicums | <i>Panicum</i> |
| Guineagrass | <i>P. Paximum</i> |
| Fall Panicum | <i>P. dichotomiflorum</i> |
| Texas Panicum | <i>P. texanum</i> |
| Witchgrass | <i>P. capillare</i> |
| Italian Ryegrass | <i>Lolium multiflorum</i> |
| Sandbur | <i>Cenchrus spp.</i> |
| Red Sprangletop | <i>Leptochloa filiformis</i> |
| Stinkgrass | <i>Eragrostis cilianensis</i> |
| ANNUAL BROADLEAF WEEDS: | |
| Carpetweed | <i>Mollugo verticillata</i> |
| Common Chickweed | <i>Stellaria media</i> |
| Coast Fiddleneck | <i>Amsinckia intermedia</i> |
| Filaree | <i>Erodium spp.</i> |
| Groundsel | <i>Senecio spp.</i> |
| Prostrate Knotweed | <i>Polygonum aviculare</i> |

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| WEEDS CONTROLLED BY DEVIRINOL 2-G ORNAMENTAL | |
|-----------------------------------------------------|-----------------------------------|
| Lambsquarters | <i>Chenopodium album</i> |
| Prickly Lettuce | <i>Lactuca serriola</i> |
| Little Mallow* | <i>Malva parviflora</i> |
| Redroot Pigweed | <i>Amaranthus retroflexus</i> |
| Pineappleweed | <i>Matricaria matricarioides</i> |
| Common Purslane | <i>Portulaca oleracea</i> |
| Horse Purslane | <i>Trianthema portullacastrum</i> |
| Common Ragweed** | <i>Ambrosia artemisiifolia</i> |
| Annual Sowthistle | <i>Sonchus oleraceus</i> |

*From seed

**Suppression

WHERE TO USE THIS PRODUCT

DEVIRINOL 2-G ORNAMENTAL can be applied over small ornamental plants or around larger plants in rose gardens, container plantings, ornamental landscapes and ground covers including dichondra.

Use DEVIRINOL 2-G ORNAMENTAL for weed control in the following plants:

Deciduous and Evergreen Trees

- | | | |
|--------------|-----------------------------|-------------|
| Acer | Eucalyptus | Picea |
| Ash | Ficus | Pin Oak |
| Birch | Fir | Pinus |
| Black Walnut | Gleditsia | Pittosporum |
| Cedar | Hemlock | Podocarpus |
| Citrus | Japanese Larch | Populus |
| Crataegus | Laburnum | Prunus |
| Cypress | Malus | Pears |
| Dogwood | Olive (Olea) | Pistachios |
| Douglas Fir | Palm (Washingtonia robusta) | |

Deciduous and Evergreen Shrubs

- | | | |
|-----------------------|------------------------|--------------|
| Abelia | Forsythia | Oleander |
| Asparagus (Sprengeri) | Gardenia | Osmanthus |
| Aucuba | Heather (Calluna) | Photinia |
| Azalea | Hibiscus | Pittosporum |
| Bottlebrush | Honeysuckle (Lonicera) | Podocarpus |
| Bougainvillea | Hypericum | Pyracantha |
| Buxus | Ilex | Raphiolepis |
| Camellia | Juniperus | Rhododendron |
| Cotoneaster | Leucothe | Rosa |
| Crepe Myrtle | Ligustrum | Star Jasmine |
| Dogwood | Nandina | Taxus |
| Euonymus | Natal Plum | Viburnum |
| | | Xylosema |

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Ground Covers

Ajuga
Carpobrotus
Delosperma
Dichondra
Erysimum
Ganzania

Hedera
Hypericum
Iceplant
Ivy
Lantana

Liriope
Osteosperma
Pachysandra
Sedum
Vinca

CONTAINERS

Abelia
Agapanthus
Ageratum
Asparagus
Azalea
Bottlebrush
Bougainvillea
Buxus
Camellia
Cedar
Cotoneaster
Crepe Myrtle
Cypress
Dogwood
Douglas Fir

Eucalyptus
Euonymus
Fir
Forsythia
Gardenia
Geranium
Heather
Hedera
Hibiscus
Ilex
Juniperus
Leucothe
Ligustrum
Liriope
Nandina

Pachysandra
Palm (Washingtonia robusta)
Photinia
Pinus spp.
Pittosporum
Podocarpus
Pyracantha
Raphiolepis
Rhododendron
Rosa
Sedum
Star Jasmine
Thuja
Vinca
Xylosema

Flowers

African Daisy
Aster
Bird of Paradise

Chrysanthemum
Dahlia
Daisy
Geranium
Gladiolus

Narcissus
Petunia
Plantain Lily (Hosta)
Zinnia

Fruit and Nuts

Almond
Apple
Apricot
Cherry
Filbert
Grape

Lemon
Nectarine
Orange
Peach
Pear
Pecan

Pistachio
Plum
Prune
Tangerine
Walnut

Strawberry: Applications should be delayed until the desired number of daughter plants have become established. Do not apply from bloom through harvest.

WHEN TO USE THIS PRODUCT

DEVIRINOL 2-G ORNAMENTAL should be used before weeds germinate. It will not control established weeds.

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Application can be made anytime of the year to weed-free soil. Fall and winter applications will provide excellent weed control the following spring and summer.

In containers, apply after setting and watering the plants.

DEVRINOL 2-G ORNAMENTAL should be spread evenly on the soil surface using a shaker can or granular herbicide applicator.

Do not apply when weather conditions favor drift from areas treated.

When weed infestation is heavy or when broadleaves are the primary weeds, use 6.9 lbs. per 1,000 sq. ft.). For annual grassy weeds or when weed infestation is light, use 4.6 lbs. per 1,000 sq.ft.).

Do not apply more than 4.6 lb. DEVRINOL 2-G ORNAMENTAL per 1,000 sq. ft in California.

DEVRINOL 2-G ORNAMENTAL should be incorporated evenly into the soil using a hand cultivator to a depth of 1-2 inches or irrigation or natural moisture (rainfall or snow) (1/2 inch within 2-3 days) for optimum results.

For weed control in dichondra, apply at the time of seeding or to establish dichondra including dichondra sod. Irrigate with a minimum of one inch of water.

**RECOMMENDATIONS: TURF GRASS
(For Use on Warm Season Grasses Only)**

DEVRINOL 2-G ORNAMENTAL is recommended for annual bluegrass, crabgrass and goosegrass control in the following established turf grasses: bahia, bermudagrass, centipede, St. Augustine and fescue.

TIMING OF APPLICATION:

For control of crabgrass and goosegrass, apply DEVRINOL 2-G ORNAMENTAL at the recommended rate. Application should be made 2-3 weeks prior to weed emergence. DEVRINOL 2-G ORNAMENTAL should be applied with a gravity flow drop spreader or a cyclone type spreader. A more uniform application can be made by spreading half the required amount over the area to be treated, then applying the remainder at right angles.

DEVRINOL 2-G ORNAMENTAL requires a minimum of one half (1/2) inch of rainfall or irrigation 2-3 days after application for adequate control. If irrigation methods are not available, the timing of the application of DEVRINOL 2-G ORNAMENTAL should be moved back several weeks to allow for some rainfall between application and weed germination.

RATES OF APPLICATION:

For Crabgrass Control: Apply 2.25-3.38* lbs. per 1,000 sq. ft. of DEVRINOL 2-G ORNAMENTAL uniformly Use the higher rate when applying before January 1 (not applicable north of South Carolina or when weed infestation is expected to be heavy).

*Where a rate range is given, use the higher rate when weed infestation is expected to be heavy.

For Goosegrass Control: Apply 2.25-3.38 lbs. per 1,000 sq. ft. of DEVRINOL 2-G ORNAMENTAL. Goosegrass usually starts to germinate 6 to 7 weeks after the start of crabgrass germination.

Split Application for Crabgrass and Goosegrass Control: When both of these weeds are to be controlled, apply 2.25 lbs. per 1,000 sq. ft. of DEVRINOL 2-G ORNAMENTAL spread uniformly for

crabgrass and another 2.25 lbs. per 1,000 sq. ft. of DEVIRINOL 2-G ORNAMENTAL for goosegrass. Apply 8-10 weeks apart. Timing should be adjusted to the germination of weeds in your area. Split applications give longer and better weed control than one application.

For Annual Bluegrass (Poa Annua) Control: Annual bluegrass is a winter annual in most of the warm season turf regions; therefore, application of DEVIRINOL 2-G ORNAMENTAL should be made in the fall before the annual bluegrass germinates. Apply 2.25-3.38 lbs. per 1,000 sq. ft. of DEVIRINOL 2-G ORNAMENTAL.

Reseeding: Do not reseed or overseed within six months after application.

STORAGE AND DISPOSAL

Pesticide Storage: Store in original container out of the reach of children and pets. In case of leak or spill, contain material and dispose of as waste.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [insert telephone number] for disposal instructions. Never place unused product down any indoor or outdoor drain. [Editor's note; supplemental distributor will insert own toll free number.]

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**CONDITIONS OF SALE
AND LIMITATION OF WARRANTY AND LIABILITY**

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of United Phosphorus, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus and Seller harmless for any claims relating to such factors.

United Phosphorus warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or United Phosphorus, and Buyer and User assume the risk of any such use. **UNITED PHOSPHORUS MAKES NO IMPLIED WARRANTY OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

In no event shall United Phosphorus or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF UNITED PHOSPHORUS AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF UNITED PHOSPHORUS OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

United Phosphorus and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of United Phosphorus.

DEVRINOL® is a registered trademark of United Phosphorus Inc.
Rev. 2/04



United Phosphorus, Inc.

423 Riverview Plaza
Trenton, NJ 08611
(609) 392-8200 x 18 (phone)
(609) 392-0808 (fax)

Rebecca A. Clemmer
Regulatory Affairs Manager

March 23, 2004

Mr. James Tompkins, PM 25
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Re: Resubmission of Notification
Devrinol 2-G Ornamental Herbicide, EPA Reg. No. 70506-33

Dear Mr. Tompkins:

Enclosed please find a duplicate of our February 23, 2004 Notification, which was rejected for technical reasons. We have revised the form to include the certification statement required by PR Notice 98-10, as requested by the EPA letter dated March 15 from Joyce M. Edwards.

The entire original package is herewith submitted.

Very truly yours,

A handwritten signature in cursive script that reads "Rebecca A. Clemmer".

Rebecca A. Clemmer
rclemmer@upi-usa.com

*Devrinol 2-G Ornamental Key File
70506-33*

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United Phosphorus, Inc.

423 Riverview Plaza
Trenton, NJ 08611
(609) 392-8200 (phone)
(609) 392-0808 (fax)

Ann M. Tillman
Technical Director

February 23, 2004

Mr. James Tompkins, PM 25
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tompkins:

**DEVRIKOL 2-G Ornamental Herbicide (Active Ingredient - Napropamide)
EPA REG. NO. 70506-33
NOTIFICATION**

To be able to subregister the above product, our supplemental distributors require some changes in the Devrinol 2-G Ornamental herbicide label. The following changes are being made and submitted as a notification:

1. Storage and Disposal section was revised per EPA's Label Review Manual to add the option of marketing in plastic containers. The exact wording found in the Manual is used so no amendment is required to add this text.
2. Added 10.5 lb as an alternate container size on master and sub-labels.
3. Added "Engineering Control Statement" heading to the master label which was missing in previous version.
4. Removed the phrase "24-Hours" from the Hotline Number.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1 (OPP Identifier No. 274764)
- Five (5) copies of the label for Devrinol 2-G Ornamental and one (1) copy highlighted to show the revised Storage and Disposal Section. In addition five (5) copies of the sublabel for Devrinol 2-G Ornamental and one (1) highlighted copy are enclosed.

If you have any questions about this notification, please contact me at (609) 392-8200.

Sincerely,

Ann M. Tillman, Ph.D.
Technical Director
United Phosphorus, Inc.

Enclosures

