

70506-33

12/29/2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

United Phosphorus, Inc.
630 Freedom Business Center
King of Prussia, PA 19406

12-29-10

Subject: Napropamide RED Amendment
EPA Reg. No.: 70506-33 / Devrinol 2-G Ornamental Selective Herbicide

The labeling referred to above, submitted in connection with the napropamide RED is acceptable provided you make the following changes to the label:

1) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

“CAUTION
Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing.”

2) Because this product contains WPS statements, the following text as noted in the acute toxicity review should be added to the handler PPE section:

“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.”

3) Per the RED, the early entry glove text “chemical-resistant gloves” appearing in the Agricultural Use Requirements box must be revised to read “chemical-resistant gloves made of any waterproof material.”

4) The following label restrictions, omitted from the RED label table but appearing on Pages 37 and 39 of the RED, must be added to the label and any conflicting text must be deleted:

“Turf
The maximum application rate is 2 lbs ai per acre per application.
Do not apply more than once per year.

Ornamentals
The maximum application rate is 6 lbs ai per acre per application.
Do not apply more than twice per year.
The maximum annual application rate is 12 lbs ai per acre per year.”

Note:

-Rates of up to 150 lbs of product (3 lbs ai) per acre to treat turf exceed the maximum allowable rate of 2 lbs ai per acre. The label must be revised.

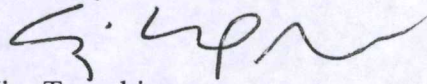
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-Also, the split application to control crabgrass and goosegrass with applications 8 to 10 weeks apart, conflicts with the restriction to only apply once per year. The label must be revised.

- 5) Add "exists" after "washables" on page 3. Change "general precautions" to "Use Precautions".

A stamped copy of the label is enclosed for your records. This label supersedes all previously accepted labels. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Sincerely,



Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division

30811

ACCEPTED
with COMMENTS
in EPA Letter Dated:

12-29-10

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

70506-33



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%

OTHER 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

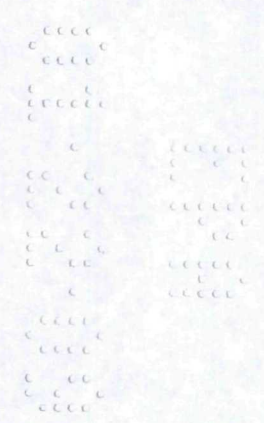
CAUTION

**SEE SIDE PANEL FOR STATEMENT OF PRACTICAL TREATMENT
AND PRECAUTIONARY STATEMENTS**

Made in U.S.A.

Marketed by:
United Phosphorus, Inc.
630 Freedom Business Center
King of Prussia, PA 19406
1-800-438-6071 • www.upi-usa.com

NET WEIGHT:



40811

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.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call the Rocky Mountain Poison Control Center at 1-866-673-6671.</p>	
<p>HOT LINE NUMBER</p> <p>For chemical emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300.</p>	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

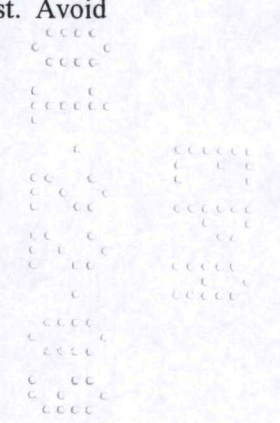
CAUTION

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 (PPE)

Mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical resistant gloves.
- Shoes plus socks.



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.

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. Pilots must use an enclosed cockpit that meets the requirements in the Worker Protection Standard.

User Safety Recommendations

Users should:

- Wash hands 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

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 specified purposes and at indicated 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.

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 statements on this label about personal protective equipment (PPE) and restricted-entry interval (REI). 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.

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Exception: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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
- Chemical resistant gloves.
- Eye wear
- Shoes plus socks

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

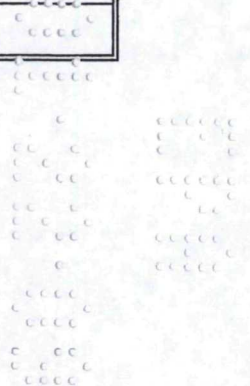
DEVTRINOL 2-G ORNAMENTAL controls certain annual grassy and broadleaf weeds as they germinate. It does not control established weeds. The weeds controlled are listed below:

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

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WEEDS CONTROLLED BY DEVIRINOL 2-G ORNAMENTAL	
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>
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



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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 | Elm, Siberian | Picea |
| Alder, Black | Eucalyptus | Pine, White |
| Ash | Ficus | Pin Oak |
| Balsam Fir | Fir | Pinus |
| Birch | Gleditsia | Pittosporum |
| Birch, European White | Golden Rain Tree | Podocarpus |
| Black Walnut | Gum, Sweet | Populus |
| Cedar | Hemlock | Prunus |
| Citrus | Japanese Larch | Pears |
| Crataegus | Laburnum | Pistachios |
| Cypress | Little Leaf Linden | Spruce, Colorado Blue |
| Dogwood | Malus | Tulip Tree |
| Douglas Fir | Maple, Japanese | Wisteria, Chinese |
| | Maple, Red | |
| | Olive (Olea) | |
| | Palm (Washingtonia robusta) | |

Deciduous and Evergreen Shrubs

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

Ground Covers

- | | | |
|------------------------|---------------------|--------------|
| Ajuga | Fern, Log | Lantana |
| Carpobrotus | Fern, Royal | Liriope |
| Delosperma | Fern, Shaggy Shield | Osteosperma |
| Dichondra | Ganzania | Pachysandra |
| Erysimum | Hedera | Ribbon Grass |
| Fern, Christmas | Hypericum | Russian Sage |
| Fern, Hay-scented | Iceplant | Sedum |
| Fern, Japanese Painted | Ivy | Silver Sage |
| Fern, Lady | | Vinca |

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CONTAINER STOCK

- | | | |
|---------------|------------|-----------------------------|
| Abelia | Eucalyptus | Pachysandra |
| Agapanthus | Euonymus | Palm (Washingtonia robusta) |
| Ageratum | Fir | Photinia |
| Asparagus | Forsythia | Pinus spp. |
| Azalea | Gardenia | Pittosporum |
| Bottlebrush | Geranium | Podocarpus |
| Bougainvillea | Heather | Pyracantha |
| Buxus | Hedera | Raphiolepis |
| Camellia | Hibiscus | Rhododendron |
| Cedar | Ilex | Rosa |
| Cotoneaster | Juniperus | Sedum |
| Crepe Myrtle | Leucothe | Star Jasmine |
| Cypress | Ligustrum | Thuja |
| Dogwood | Liriope | Vinca |
| Douglas Fir | Nandina | Xylosema |

Flowers

- | | | |
|---------------------|-------------------|-----------------------|
| African Daisy | Dahlia | Petunia |
| Aster | Daisy | Pincushion Flower |
| Beard-Tongue | Daylily | Plantain Lily (Hosta) |
| Bellflower, Tussock | Gazania | Redrocks Penastemon |
| Bird of Paradise | Geranium | Speedwell |
| Blanket Flower | Gladiolus | Stonecrop |
| Bleeding Heart | Leopards Bane | Sun Daisy |
| Boltonia | Lily of the Incas | Sunset Hyssop |
| Cheddar Pink | Moss Pink | Yarrow, Common |
| Chrysanthemum | Mums | Yellow Loostrife |
| Cleyera | Narcissus | Zinnia |
| Coneflower, Purple | Pasque Flower | |

Fruit and Nuts

- | | |
|--------|-------|
| Almond | Pecan |
|--------|-------|

- Filbert
- Grape

Strawberry: Delay applications until the desired number of daughter plants have become established. Do not apply from bloom through harvest.

WHEN TO USE THIS PRODUCT

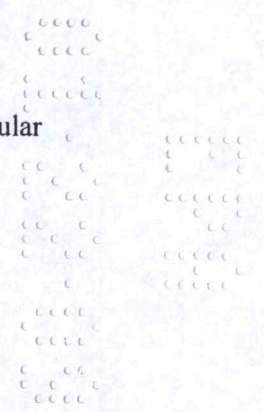
Apply DEVIRINOL 2-G ORNAMENTAL before weeds germinate. It will not control established weeds.

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.

Spread DEVIRINOL 2-G ORNAMENTAL evenly on the soil surface using a shaker can or granular herbicide applicator.

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



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When weed infestation is heavy or when broadleaves are the primary weeds, use one pound on 145 square feet (6.9 lbs./1,000 sq. ft.). For annual grassy weeds or when weed infestation is light, use one pound on 218 square feet (4.6 lbs/1,000 sq.ft.).

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

Incorporate DEVIRINOL 2-G ORNAMENTAL 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.

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

Apply DEVIRINOL 2-G ORNAMENTAL 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 DEVIRINOL 2-G ORNAMENTAL at the specified rate. Apply 2-3 weeks prior to weed emergence. Apply DEVIRINOL 2-G ORNAMENTAL 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.

DEVIRINOL 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, move the timing of the application of DEVIRINOL 2-G ORNAMENTAL back several weeks to allow for some rainfall between application and weed germination.

RATES OF APPLICATION:

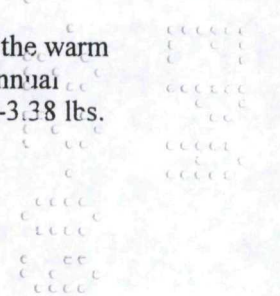
For Crabgrass Control: Apply 100 to 150 lbs. of DEVIRINOL 2-G ORNAMENTAL uniformly per acre (2.25-3.38* lbs per 1,000 sq. ft.). Use the higher rate when applying before January 1 (not applicable north of South Carolina or when weed infestation is expected to be heavy).

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

For Goosegrass Control: Apply 100 to 150 lbs. of DEVIRINOL 2-G ORNAMENTAL per acre (2.25-3.38 lbs. per 1,000 sq. ft.). 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 100 lbs. of DEVIRINOL 2-G ORNAMENTAL spread uniformly per acre (2.25 lbs. per 1,000 sq. ft.) for crabgrass and another 100 lbs. of DEVIRINOL 2-G ORNAMENTAL per acre for goosegrass. Apply 8-10 weeks apart. Adjust timing 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, apply DEVIRINOL 2-G ORNAMENTAL in the fall before the annual bluegrass germinates. Apply 100-150 lbs. of DEVIRINOL 2-G ORNAMENTAL per acre (2.25-3.38 lbs. per 1,000 sq. ft.).



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

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container closed when not in use. Store in a cool dry place. Do not store near seeds, fertilizer or food stuffs.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**IMPORTANT INFORMATION
READ BEFORE USING PRODUCT**

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 reflect the opinion of experts based on field use and tests, and must be followed carefully. 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 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. Handling, storage, and use of the product by Buyer or User are beyond the control of United Phosphorus, Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus, Inc. and Seller harmless for any claims relating to such factors.

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United Phosphorus, Inc. 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 the duly authorized representative of United Phosphorus, Inc.

DEVIRINOL® is a registered trademark of United Phosphorus Inc.

Rev.1/09

