

70506-93

07/21/2005

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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
	Environmental Protection Agency	<input type="checkbox"/> Amendment	274882
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 70506-93	2. EPA Product Manager J. Miller	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) United Phosphorus, Inc./Clopyralid Technical	PM # 23	
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 Agency letter dated _____	NOTIFICATION JUL 21 2005
<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: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of changes to label and CSF related to change in company ownership. 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	
<p align="center">Certification</p> <p>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</p>					6. Date Application Received (Stamped)
2. Signature 			3. Title Regulatory Affairs Manager		
4. Typed Name Rebecca A. Clemmer			5. Date July 7, 2005		

AgValue Clopyralid Technical

ACTIVE INGREDIENT:

Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid..... 96.0%

INERT INGREDIENTS: 4.0%

TOTAL..... 100.0%

**KEEP OUT OF REACH OF CHILDREN
DANGER**

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly with a steady, gentle stream of 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 physician for treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Call a physician or poison control center 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 poison control center or physician. • Do not give anything by mouth to an unconscious person.
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 physician for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Wash skin with plenty of water for 15-20 minutes. • Call a poison control center or physician for treatment advice.
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p>For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC at 1-800-424-9300.</p>	

See side panel for additional precautionary statements.

Manufactured For:

AgValue Clopyr. LLC United Phosphorus, Inc.
Visalia, CA 93291-423 Riverview Plaza

Trenton, NJ 08611

1-800-247-1557 • www.upi-usa.com

EPA Reg. No. 75147-370506-93
EPA Est. No.

Net Weight:

**NOTIFICATION
JUL 21 2005**

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals
DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product may only be formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

Agricultural Uses

Asparagus, barley, corn, fallow land, grasses, mint, oats, pasture, rangeland, sugar beets, tree plantations, and wheat. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult ~~AgValue Clopyr, LLC~~ United Phosphorus, Inc. for instructions for formulation and other information.

Non-Agricultural Uses

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such uses(s). Consult ~~AgValue Clopyr, LLC~~ United Phosphorus, Inc. for instructions for formulation and other information.

This product must not be formulated into manufacturing-use products or end-use products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- Do not use on residential turf
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store in a cool, dry, well-ventilated area.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinseate 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.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.

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

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. UNITED PHOSPHORUS, INC. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.



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

July 7, 2005

Joanne Miller (PM 23)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protections Agency
1801 Bell Street
Arlington, VA 22202

Re: Submission of Revised Labeling and Confidential Statements of Formula for
Clopyralid Technical (EPA Reg. No. 70506-93)
Oryzalin Technical (EPA Reg. No. 70506-95)
Etho Tech (EPA Reg. No. 70506-105)

Dear Ms. Miller:

In connection with the recent transfer of registrations from AgValue to United Phosphorus, UPI is submitting the attached Notifications to accomplish these actions for the subject products:

- remove "AgValue" from the product names;
- add CHEMTREC contact information to the main panel;
- update all AgValue information to United Phosphorus; and
- add warranty language.

In support of the changes, enclosed please find:

- one copy of each label, marked to show changes, and
- EPA form 8570-1 for each product.

Also enclosed for your files is a copy of a Confidential Statement of Formula for each of the products. These CSFs are the most recently approved versions already in Agency files, with the only changes being the company name and EPA Registration Number.

no CSF

Please contact me if you have any questions.

Very truly yours,

Rebecca A. Clemmer
rclemmer@upi-usa.com