

70506-93

09/20/2005

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

SEP 20 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

United Phosphorus Inc.
c/o Michael Kellogg
Pyxis Regulatory Consulting
11324 17th Ave. Ct. N.W.
Gig Harbor, WA 98332

Gentlemen:

Subject: Add New Uses and Revised Labeling
Clopyralid Technical
EPA Registration No 70506-93
Your Submission Dated September 8, 2005

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) or 4(a) when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- The Conditions of Sales and Limited Warranty section is unacceptable since it only warrants the chemical description on the label. This negates the directions for use and precautionary statements required on pesticide labeling by FIFRA. Refer to the enclosed 1966 PR Notice for acceptable statements.

3. Submit one (1) copy of your final printed labeling before you release the product for shipment. 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 bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

If you have any questions concerning this letter please contact Mr. James Stone
at 703-305-7391.

Sincerely yours,

Joanne I. Miller

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

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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:
United Phosphorus, Inc.
423 Riverview Plaza

Trenton, NJ 08611

1-800-247-1557 • www.upi-usa.com

EPA Reg. No. 70506-93
EPA Est. No.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

SEP 20 2005

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

Net Weight:

70506-93

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, broccoli, broccoli raab, Brussels sprouts, cabbage, canola, cauliflower, Chinese cabbage, Chinese broccoli, collards, corn, fallow land, garden beets, grasses, kale, kohlrabi, mint, mizuna, mustard greens, mustard spinach, oats, pasture, rangeland, rape greens, spinach, stone fruits, sugar beets, tree plantations, turnips, 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 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 manufacturing and storage sites, non-cropland, parks, rights-of-way, sod farms and roadsides; grass grown for seed; select ornamental plantings in landscapes and nurseries, forest sites; CRP acres. 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 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 rinsate 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.