

81949-1

5/11/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Curahee Animal Health
% Peggy M. Galloway
Landis International, Inc.
P.O. Box 5126
Valdosta, GA 31603-5126

MAY 11 2010

Re: **Registration Review** for Early Bale
EPA Registration 81949-1
Decision Number 419799
Response to EPA/SRRD Email Dated 12/11/08

Dear Ms Galloway:

The Agency is in receipt of your revised label submitted September 9, 2009, and has confirmed the specified language with respect to the baling of hay has been added as requested. As previously noted, this change ensures negligible environmental exposure, and therefore, allows the Agency to proceed with a final registration review decision without data call in for the following:

850.4100 Seedling Emergence, Tier 1
850.4150 Vegetative Vigor, Tier 1
830.7050 Ultraviolet/Visible Absorption

The label is acceptable provided the following changes are made:

1. Change the Signal Word from "**DANGER**" to "**DANGER/PELIGRO**"
2. Add the following immediately below the signal word: "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.)"
3. Add the following paragraph below the section **Hazards to Humans and Domestic Animals**:

"Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them."

4. Add the following text box above the header **Environmental Hazards**:

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USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should 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.

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

5. Put the **STORAGE AND DISPOSAL** instructions into a text box to set them off from the rest of the text.
6. Add the following to the **CONTAINER DISPOSAL** instructions to read:

“Triple rinse or pressure rinse container before disposing.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Offer rinsed container for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.”

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7. In the section **CONDITIONS OF SALE** change "To the extent allowed by law...." to "To the extent consistent with applicable law...."

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supersedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

The Agency has determined that the registrant may distribute and sell propionic acid products bearing old labels/labeling for 12 months from the date of issuance of this letter. Registrants and persons other than the registrant remain obligated to meet existing stocks requirements applicable to products they sell or distribute.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

Lisa Jones FOR

Shaja B. Joyner
Product Manager (20)
Fungicide Branch
Registration Division (7504P)

Enclosure: Label stamped "Accepted with Comments"

Early Bale

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAY 11 2010

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

81949-1

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Early Bale is a preservative for hay that is baled at 16% to 30%

ACTIVE INGREDIENTS

Propionic acid 68.0%
Other Ingredients 32.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN DANGER	
FIRST AID	
If in Eyes	<ul style="list-style-type: none"> •Hold eyes open and rinse slowly and gently with water for 15-20 minutes. •Remove contact lenses, if present, after first 5 minutes then continue rinsing eye. •Call a poison control center or doctor for further treatment advice.
If Swallowed	<ul style="list-style-type: none"> •Call poison control center or doctor immediately for treatment advice. •Do not induce vomiting unless told to do so by the poison control center or doctor. •Have person sip a glass of water if able to swallow. •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.
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 further treatment advice.
Hotline Number	
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact CHEMTREC (800) 424-9300 (24 hours) for emergency medical treatment information.</p>	
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

EPA Reg. No. 081949-00001

EPA Est. No. 81949

Manufactured By:

Currahee Animal Health
659 Athens Street
Jefferson, GA 30549

LOT# _____

NET WEIGHT: 2000 LBS 450 LBS 120 LBS 50 LBS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Harmful if swallowed or absorbed through skin. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Wear chemical-resistant gloves, chemical-resistant aprons, chemical resistant footwear, and goggles or face shield when loading application equipment unless a closed loading system is used. Avoid walking near high concentrations of spray mist/vapor. Use with adequate ventilation. Wash thoroughly after handling.

ENVIRONMENTAL HAZARDS

For terrestrial uses. 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.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. READ ENTIRE LABEL, USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

Early Bale is a preservative for hay that is baled at 16% to 30% moisture. It can be used on alfalfa, Bermuda grass, bluegrass, brome grass, clover, cowpea hay, fescue, lespedeza, lupines, orchard grass, peanut hay, rye grass, soybean hay, sudan grass, timothy, and vetch that is baled in small square, large round or large square bales. When used in accordance with label directions, it will prevent the growth of mold in the hay and related heating, discoloration and loss of feed value.

This product may only be used during the baling process if appropriate baler equipment is used which prevents exposure of non-target organisms to this pesticide product. Do not apply to pre-harvest hay or straw, cut hay and straw in the field prior to baling, or to hay and straw after it has been baled. Apply product to the hay and straw as it is fed into the baler, using the rates on this label. The baler application equipment must prevent drippage and drift, and must function properly and be used/maintained in accordance with the manufacturer's written operating instructions.

Small Square & Large Round Balers			Large Square Balers		
Moisture	Stem Moisture	Dew Moisture Only	Moisture	Stem Moisture	Dew Moisture
16% - 22%	4 lb/ton	2 lb/ton	16% - 22%	6 lb/ton	3 lb/ton
22% - 26%	8 lb/ton	6 lb/ton	22% - 26%	10 lb/ton	8 lb/ton
26% - 30%	16 lb/ton	12 lb/ton	26% - 30%	DO NOT BALE	16 lb/ton

STORAGE AND DISPOSAL

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

STORAGE: Seal tightly. Do not store in direct sunlight.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of unused pesticide or rinse water is a violation of federal law. If these wastes cannot be used 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 in proper disposal methods.

CONTAINER DISPOSAL:

Refillable container. Refill this container with *ammonium propionate* only. Do not use this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning the container before refilling is the responsibility of the refiller.

CONDITIONS OF SALE

Currahee Animal Health warrants that this material conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use, subject to the risks referred to therein. Currahee Animal Health makes no other expressed or implied warranty of fitness or merchantability or any other expressed or implied warranty. To the extent allowed by law, neither Currahee Animal Health nor the seller shall be liable for consequential, special or indirect damages resulting from the use or handling of this product including but not limited to, loss of profits, business reputation or customers, labor costs or other expenses incurred in planting or harvesting. Currahee Animal Health and seller offer this product and the buyer and user accept it subject to the foregoing conditions of sale and warranty which may be varied only by agreement in writing signed by a duly authorized representative of Currahee Animal Health.

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