

82557-1

06/12/2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUN 12 2007

Mr. Robert Butz
Keller and Heckman LLP
Agent for: Sinon USA Inc.
1001 G Street, N.W.
Suite 500 West
Washington D.C. 20001

Subject: Paraquat SL Herbicide
EPA Registration Number 82557-1
Application dated April 9, 2007
Supplemental labeling "Alfalfa-Dessication of alfalfa to aid harvesting of alfalfa seed" and "Trees and Vines- orchards, vineyards, wind break, shade and ornamental trees"

Dear Mr. Butz:

The supplemental labeling referred to above and submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable, provided you make the following change before you release the product for shipment.

1) On the supplemental labeling "Trees and Vines- orchards, vineyards, wind break, shade and ornamental trees" revise the statement "This Supplemental labeling containers revised use instructions or instructions that may be different from those that appear on the container label" to "This Supplemental labeling **contains** revised use instructions or instructions that may be different from those that appear on the container label."

At your next label printing, or within eighteen months of the date of this letter, whichever comes first, you must incorporate this supplemental labeling into the main product labeling. A stamped copy of the label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment. If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Tompkins".

James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

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SUPPLEMENTAL LABELING

Restricted Use Pesticide.

Due to acute toxicity.

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

PARAQUAT SL HERBICIDE™

Defoliant and desiccant herbicide for the control of weeds and grasses and as a harvest aid

DIRECTIONS FOR USE: TREES AND VINES – orchards, vineyards, wind break, shade & ornamental trees

EPA REG. No. 82557-1

Active Ingredient:

Paraquat dichloride (1,1'-dimethyl-4-4'- Bipyridinium dichloride)43.8%

Other Ingredients:56.2%

Total:100.0%

Contains 3.0 pounds paraquat cation per gallon as 4.143 pounds salt per gallon.
Contains stench (odor) and emetic.

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 12 2007

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

KEEP OUT OF REACH OF CHILDREN

DANGER/PELIGRO



POISON

82557-1

**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.)**

- NEVER PUT INTO FOOD, DRINK OR OTHER CONTAINERS.
- IF SWALLOWED, TAKE IMMEDIATE ACTION AS PRESCRIBED IN FIRST AID.
- SYMPTOMS ARE PROLONGED AND PAINFUL.
- DO NOT USE OR STORE IN OR AROUND THE HOME.
- DO NOT REMOVE CONTENTS EXCEPT FOR IMMEDIATE USE.
- THE ODOR OF THIS PRODUCT IS FROM THE STENCHING AGENT WHICH HAS BEEN ADDED, NOT FROM PARAQUAT.

All applicable directions, restrictions, and precautions on the EPA-registered label must be followed. Before using Paraquat SL Herbicide™ as permitted according to this Supplemental Labeling, read and follow all applicable directions, restrictions, and precautions on the EPA-registered label on or attached to the pesticide product container. This Supplemental Labeling containers revised use instructions or restrictions that may be different from those that appear on the container label. This Supplemental Labeling must be in the possession of the user at the time of the pesticide application. It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Crop	Use Pattern	PARAQUAT SL HERBICIDE™ Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Additional Precautions, Restrictions and Directions
TREES AND VINES Orchards, Vineyards, Windbreak, Shade & Ornamental Trees: Acerola Apples Apricots Avocados Bananas Beechnut Brazil Nut Butternut Calamondin Cashew Cherries Chestnut Chinquapin Citrus Citron Coffee Figs Filberts Grapefruit Grapes Hickory Nut Kiwi Fruit Kumquat Lemon Lime Macadamia Nuts Mandarin Nectarines Olives Orange (sour & sweet) Papayas Peaches Pears Pecans Pistachios Plums Prunes Pummelo Satsuma mandarin Walnuts Other shade and ornamental trees such as arborvitae, ash, elm, fir, oak, pine, etc.	Directed Spray	1.7- 2.7 pts.	Ground: 10 gals.	Apricots 28 Cherries 28 Figs 13 Kiwi Fruit 14 Nectarines 28 Olives 13 Peaches 14 Pistachios 7 Plums 28	<ul style="list-style-type: none"> • Do not make more than 5 applications per year, except for: Apricots, Cherries, Kiwi Fruit, Nectarines, Peaches, Plums, no more than 3 applications per year; Olives, no more than 4 applications and Pistachios, no more than 5 applications but only 2 applications after shells split. • Do not allow spray to make contact with green stems (except suckers), fruit or foliage. • Use the shield or wrap plant when spraying around young trees or vines. • Do not graze treated areas. • Do not feed covered crops grown in treated areas to livestock. • Do not apply when figs, nuts or olives to be harvested are on the ground. • For apricots – Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. • For cherries – Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. • For figs – Do not harvest within 13 days after application and do not exceed 5 postemergence directed applications per season. • For grapes – treat when sucker growth is no more than 8" long. Late season applications to weeds should be made to avoid contact with desirable foliage. • For kiwi fruit – Do not treat more than 3 times per year. • For mature woody weeds, perennial weeds, late germinating weeds and green suckers, retreatment or spot treatment may be necessary. • For nectarines – Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. • For olives – Do not harvest within 13 days after application and do not exceed 4 postemergence directed applications per season. • For peaches – Do not harvest within 14 days after application and do not exceed 3 postemergence directed applications per season. • For pistachios – Do not exceed 2 applications after shells split. • For plums – Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season.

Manufactured by:
 Sinon USA, Inc.
 1080 Carol Lane, Suite 264
 Lafayette, CA 94549

SUPPLEMENTAL LABELING

4/4

Restricted Use Pesticide.
 Due to acute toxicity.
 For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.

PARAQUAT SL HERBICIDE™

Defoliant and desiccant herbicide for the control of weeds and grasses and as a harvest aid

DIRECTIONS FOR USE: ALFALFA – Dessication of alfalfa to aid harvesting of alfalfa seed

EPA REG. NO. 82557-1

Active Ingredient:
 paraquat dichloride (1,1'-dimethyl-4,4'- bipyridinium dichloride)43.8%
Other Ingredients: 56.2%
Total:100.0%
 Contains 3.0 pounds paraquat cation per gallon as 4.143 pounds salt per gallon.
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DANGER/PELIGRO  **POISON**

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- DO NOT USE OR STORE IN OR AROUND THE HOME.
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DIRECTIONS FOR USE

Crop	Use Pattern	PARAQUAT SL HERBICIDE™ Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Additional Precautions, Restrictions and Directions
ALFALFA (For use only in the following states: AZ, CO, ID, MT, NV, OR, UT, WA, WY) Desiccation of alfalfa to aid harvesting alfalfa seed	Broadcast	1.7-2.7 pts.	Ground: 20-25 gals. Air: 5-10 gals.	See Precautions	<ul style="list-style-type: none"> • Do not make more than 2 applications per year. • Do not harvest until at least 4 days after application. • Do not apply when weather conditions favor drift from treated areas. • Do not apply by ground equipment within 25 ft., or by air within 75 ft. of lakes; reservoirs; rivers; permanent streams; marshes or natural ponds; estuaries; and commercial fish farm ponds. • Use only on fields in production of alfalfa seed. Do not use on fields producing alfalfa for livestock feed. Do not use any portion of the treated field for human or animal feed, including seed, seed screenings, hay forage, or stubble. • Do not cut current year's treated alfalfa seed crop for hay or forage. Do not graze current year's treated alfalfa seed crops. • Do not use treated alfalfa seed for sprouting. Tag all alfalfa seed treated with PARAQUAT SL HERBICIDE™ /Reglone® tank mix at processing plants with, "NOT FOR HUMAN CONSUMPTION". The grower is responsible for notifying the processing plants of any seed crop treated with PARAQUAT SL HERBICIDE™ /Reglone tank mix. • Remove ALL PARAQUAT SL HERBICIDE™ /Reglone® treated alfalfa seed screenings from the feed market because all screenings from alfalfa seed processing are prohibited from feed channels.
PARAQUAT SL HERBICIDE™ /Reglone® Tank Mix	Broadcast	1.3-2.7 pts. PARAQUAT SL HERBICIDE™/ 2 pts. Reglone®	Ground: 20-25 gals. Air: 5-10 gals.	See Precautions	

®Reglone is a trademark of Syngenta Group Company

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