



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 5, 2015

Mr. Michael Kellogg  
Agent  
Willowood Ethofumesate LLC  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Subject: Label Amendment – Revised Precautionary Statements  
Product Name: Willowood Ethofumesate Technical  
EPA Registration Number: 87289-1  
Application Date: October 9, 2014  
Decision Number: 497094

Dear Mr. Kellogg:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2  
EPA Reg. No. 87289-1  
Decision No. 497094

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact BeWanda Alexander by phone at (703)305-7460, or via email at [alexander.bewanda@epa.gov](mailto:alexander.bewanda@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Shaja Joyner".

Shaja Joyner, Product Manager 20  
Fungicide and Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

**WILLOWOOD ETHOFUMESATE TECHNICAL**  
FOR USE IN FORMULATING HERBICIDES ONLY

ACTIVE INGREDIENT:

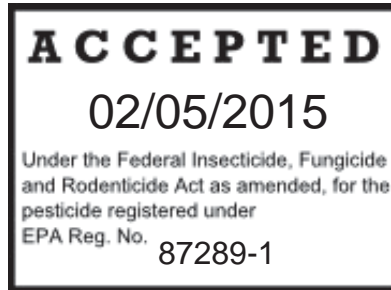
Ethofumesate (2-ethoxy-2,3-dihydro-3,3-dimethyl-5-benzofuranyl methanesulfonate) .....98.8%  
 OTHER INGREDIENTS.....1.2%  
 TOTAL.....100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

<b>FIRST AID</b>	
IF IN EYES:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 -20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>• Call a Poison Control Center or doctor for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 -20 minutes.</li> <li>• Call a Poison Control Center or doctor for treatment advice.</li> </ul>
For Medical Emergencies call 24 Hours a Day 1-800-858-7378. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.	

EPA Reg. No. 87289-1

Manufactured for:  
 Willowood Ethofumesate, LLC  
 1600 NW Garden Valley Blvd., Suite 120  
 Roseburg, OR 97471



EPA Est. No.

Net Weight: xx lbs.

**PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt and long pants, socks, shoes and gloves. Wash thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet.

**ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

**DIRECTIONS FOR USE**

**It is a violation of Federal law to use this product in a manner inconsistent with its labeling.**

Only for formulation into a herbicide for: (1) the following uses: sugar beets, garden beets, onions, garlic, shallots, carrots, grass seed, commercial sod and ornamental turf; (2) uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) uses for experimental purposes that are in compliance with USEPA requirements.

Each formulator is responsible for obtaining EPA registration for his own end use products.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store in original container tightly closed and in a safe place.

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

**CONTAINER HANDLING:**

**LINED FIBERBOARD DRUMS:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

**SUPERSACK:** Nonrefillable container: Do not reuse or refill this container. Completely empty bag into formulation equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or by other procedures approved by state and local authorities.

**WARRANTY STATEMENT**

**IMPORTANT NOTICE** -Seller warrants that this product conforms to the chemical description and is reasonably fit for purposes stated on the label when used in accordance with the directions and instructions under normal conditions of use. To the extent consistent with applicable law, neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

EPA approval date