

87290-3

4/12/2011

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

APR 12 2011

Michael Kellogg, Agent
Willowood, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Harbor, WA 98332

Subject: Notification per PR Notice 98-10 (add Arizona to supplemental label for
aerial application in head lettuce)
Willowood Pronamide 50 WSP
EPA Reg. No. 87290-3
Application Dated February 18, 2011

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product. The Registration Division (RD) has conducted a review of this request finds that the action falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at ondish.mindy@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)

205



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 87290-3	2. EPA Product Manager B. Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Willowood, LLC / Willowood Pronamide 50 WSP	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Willowood, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <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 _____
<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.

NOTIFICATION

APR 12 2011

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of a minor label revision per PR Notice 98-10 to facilitate registration in the State of Arizona. 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 checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	Other (Specify) _____ WSP film	
				<input checked="" type="checkbox"/> On Label	<input type="checkbox"/> On Labeling accompanying product
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 3 x 1 lb.		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification 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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 2/18/11	

RESTRICTED USE PESTICIDE

Because Pronamide has produced tumors in laboratory animals, this product is 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.

GROUP **3** HERBICIDE

SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR WILLOWOOD PRONAMIDE 50 WSP BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

"Label" as used in this supplemental labeling refers to the label booklet for Willowood Pronamide 50 WSP and this supplement.

NOTIFICATION

APR 12 2011

Willowood Pronamide 50 WSP

EPA Reg. No. 87290-3

**For Grass and Weed Control in Head Lettuce – Aerial Application
(For Use in Arizona and California)**

KEEP OUT OF REACH OF CHILDREN

CAUTION

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Willowood Pronamide 50 WSP may be applied by aircraft for preemergence control of susceptible grasses and broadleaf weeds in head lettuce. Willowood Pronamide 50 WSP must be applied at the dosage rate of 2.0 to 4.0 pounds of product (1.0 to 2.0 pounds active ingredient) per treated acre depending on soil type (refer to comments under Dosage below). Mix the specified amount of Willowood Pronamide 50 WSP in 10 to 20 gallons of water per acre for aerial application. For aerial applications of Willowood Pronamide 50 WSP on head lettuce, consult the section below for Rotation Crop Planting Information for plantback information. Avoid drift to all other crops and non-target areas.

Dosage

Willowood Pronamide 50 WSP may be applied at the rate of 2 to 4 lbs. of product (1 to 2 lbs. active ingredient) per acre broadcast application. The dosage rate required is dependent on soil texture and method of irrigation. At rates specified on this label, Willowood Pronamide 50 WSP may not be applied for weed control on highly organic (peat and muck) soils.

Follow the dosage instructions listed in chart below:

Lbs. of Willowood Pronamide 50 WSP Per Broadcast Acre ¹		
	Dependable Rainfall	Less Dependable

Weeds	Or Overhead Irrigation	Rainfall or Furrow Irrigation	Soil Texture Group ²
susceptible annual gasses	2 - 3 (surface application)	3 - 4 (soil incorporation)	Coarse and medium Textured soils
broadleaf weeds	3 -4 (surface application)	4 (soil incorporation)	Fine textured soils

¹ Reduce dosage rate accordingly for banded applications.

² Soil Texture Group

- Coarse:** sand, loamy sand, sandy loam
- Medium:** loam, silt loam, silt, sandy clay loam
- Fine:** silty clay loam, clay loam, sandy clay, silty clay, clay

Rotation Crop Planting Information

Follow the directions given below when rotation crops will be planted to areas previously treated with Willowood Pronamide 50 WSP:

Waiting Period in Days Before Planting the Crops Indicated (1):

Amount of Willowood Pronamide 50 WSP Applied per Planted Acre	Root and Tuber Vegetables	Leafy Vegetables (except Brassica Vegetables), Crop Group 4 (2)	Barley, Buckwheat, Field Corn, Millet, Oats, Popcorn, Rice, Rye, Sorghum (milo), Teosinte, Triticale, Wheat, and Wild Rice
1.0 lb	90	30	180
2.0 lb	90	30	180
3.0 lb	90	30	180
4.0 lb	90	30	180

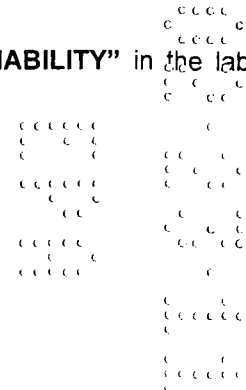
- (1) There are no plant back restrictions for Willowood Pronamide 50 WSP when rotating to artichokes, grapes, berry fruits, pome fruits or stone fruits.
- (2) Crop Group 4 as defined under 40CFR 180.41.

Whether Willowood Pronamide 50 WSP is bed-topped, banded, or broadcast, the beds must be knocked down and the field cross-disked before rotation crops other than artichokes, head lettuce, endive, radicchio or escarole are planted.

Where the Willowood Pronamide 50 WSP treatment is to be followed by a rotation crop within 180 days of application, bed-topped or banded applications are suggested.

Read the "CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY" in the label booklet for Willowood Pronamide 50 WSP before using.

Willowood, LLC
 1600 NW Garden Valley Blvd. #130
 Roseburg, OR 97471



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