



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 11, 2021

Ogongi Ogongi  
Agent  
Willowood, LLC  
c/o Wagner Regulatory Associates, Inc.  
7217 Lancaster Pike, Suite A  
Hockessin, DE 19707

Subject: Registration Review Label Mitigation for Thiobencarb  
Product Name: Willowood Thio UltraMax  
EPA Registration Number: 87290-73  
Application Date: 02/26/2020  
Decision Number: 560186

Dear Ogongi Ogongi:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Thiobencarb Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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.

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 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently

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approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Quinn Gavin by phone at 703-347-0325, or via email at [gavin.quinn@epa.gov](mailto:gavin.quinn@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Linda Arrington', with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

THIOBENCARB GROUP 8 HERBICIDE

# Willowood Thio UltraMax

[For Use in California Only]

**Active Ingredient:**

Thiobencarb (S-[(4-chlorophenyl)methyl]diethylcarbamothioate) ..... 15.0%

**Other Ingredients:** ..... 85.0%**TOTAL:** ..... 100.0%

Willowood Thio UltraMax contains 0.15 lb. Thiobencarb per pound.

**By Weight**

## KEEP OUT OF REACH OF CHILDREN CAUTION

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.)

| FIRST AID   |  |
|---|--|
| <b>If in Eyes:</b>  | <ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>   |
| <b>If Inhaled:</b>  | <ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>   |
| <b>If on Skin or Clothing:</b>  | <ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>   |
| <b>If Swallowed:</b>  | <ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul> |
| <b>HOTLINE NUMBER</b>   |  |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For 24-Hour Medical Emergency Assistance (Human or Animal), call: <b>1-800-222-1222</b> . For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), call CHEMTREC: <b>1-800-424-9300</b> . |  |
| <b>Note To Physician:</b> Thiobencarb is a cholinesterase inhibitor. If signs of cholinesterase inhibition appear, atropine is antidotal.   |  |

*[Optional referral statements when booklets and container labels are used:*

See Panel for First Aid Instructions and booklet for complete Precautionary Statements and Directions For Use.

See label booklet for complete Precautionary Statements, Directions For Use, and Storage and Disposal.

See label booklet for additional Precautionary Statements, Directions For Use, and Storage and Disposal.

See label booklet for complete Directions For Use.]

**Manufactured By [For]:**

Willowood, LLC

c/o Generic Crop Science LLC

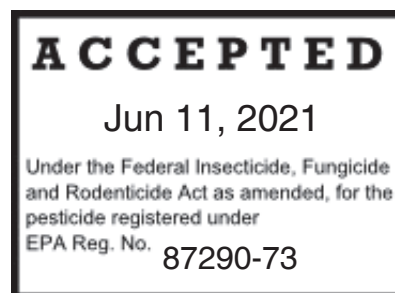
1887 Whitney Mesa Drive #9740

Henderson, NV 89014

EPA Reg. No.: 87290-73

EPA Est. No.: \_\_\_\_\_

Net Contents: \_\_\_\_\_ [Lbs./Kgs.]



## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

##### Applicators and other handlers must wear:

- Coveralls, Long-sleeved shirt and long pants
- Chemical-resistant gloves made of Barrier Laminate or Butyl Rubber  $\geq 14$  mils or Nitrile Rubber  $\geq 14$  mils or Viton  $\geq 14$  mils
- Shoes plus socks
- Chemical-resistant apron when mixing and loading, or cleaning equipment

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product. Do not reuse them. Follow 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.

**All workers must wear:** Waterproof footwear plus socks when entering flooded fields following treatment.

#### USER SAFETY RECOMMENDATIONS

##### Users should:

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling the product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### ENVIRONMENTAL HAZARDS

**NON-TARGET ORGANISM ADVISORY STATEMENT:** This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

This product is toxic to fish and shrimp. Do not apply directly to water except as directed on this label, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is restricted for use to the California Central Valley only. Do not use in other parts of California within the range of listed Pacific salmonids.

#### ENDANGERED SPECIES

The National Marine Fisheries Service has determined that thiobencarb, when used in California according to the label and existing restricted materials permit conditions, is not likely to jeopardize the continued existence of endangered or threatened salmonid species, nor is it likely to destroy or adversely modify designated critical habitat of these species. To ensure and continue the proper use of thiobencarb on rice in California, you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-844-447-3813. You must use the Bulletin valid for the month in which you will apply the product. The use limitations in the Bulletins and linked Mandatory Pesticide Use Limitations document are adapted from those currently in force for thiobencarb under the restricted materials permit conditions of the California Department of Pesticide Regulation, with enforcement by the County Agricultural Commissioners.

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

**Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.**

PPE required for entry within 12 hours after application to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, including plants, soil, or water, is:

- Coveralls

- Chemical-resistant gloves made of Barrier Laminate or Butyl Rubber  $\geq 14$  mils or Nitrile Rubber  $\geq 14$  mils or Viton  $\geq 14$  mils
  - Waterproof footwear plus socks
- PPE required for entry from 24 hours until 7 days following application to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, including plants, soil, or water, is:
- Long-sleeved shirt and long pants
  - Waterproof footwear plus socks

## 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.

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.

Do not use this product to impregnate fertilizer.

## WEED RESISTANCE MANAGEMENT

For resistance management, **Willowood Thio UltraMax** contains thiobencarb and is classified in the thiocarbamate chemical class as a Group 8 herbicide, lipid synthesis inhibitor.

Herbicide resistance is defined as the inherited ability of a plant to survive and reproduce following exposure to a dose of herbicide normally lethal to the wild type. In a plant, resistance may be naturally occurring or induced by such techniques as genetic engineering or selection of variants produced by tissue culture or mutagenesis. Any weed population may contain or develop plants that are naturally resistant to **Willowood Thio UltraMax** and other Group 8 herbicides. Weed species with acquired resistance to Group 8 herbicides may eventually dominate the weed population if Group 8 herbicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by **Willowood Thio UltraMax** or other Group 8 herbicides.

To delay herbicide resistance, consider the below best practices for resistance management:

- Plant into weed-free fields and keep fields as weed-free as possible.
- Rotate the use of Willowood Thio Ultramax or other Group 8 herbicide within a growing season sequence or among growing seasons with different herbicide group that control the same weed in the field.
- To the extent possible, use a diversified approach toward weed management. Whenever possible incorporate multiple weed-control practices including mechanical cultivation, biological management practices, and crop rotation.
- Fields with difficult to control weeds should be rotated to crops that allow the use of herbicides with alternative mechanisms of action or different management practices.
- To the extent possible do not allow weed escapes to produce seeds, roots or tubers. Manage weed seeds at harvest and post-harvest to prevent a buildup of the weed seed-bank.
- Prevent field-to-field and within-field movement of weed seed or vegetative propagules. Thoroughly clean plant residues from equipment before leaving fields.
- Prevent an influx of weeds into the field by managing field borders.
- Identify weeds present in the field through scouting and field history and understand their biology. The weed-control program should consider all of the weeds present.
- Difficult to control weeds may require sequential applications of herbicides with differing mechanisms of action.
- Apply this herbicide at the correct timing and rate needed to control the most difficult weed in the field.
- Use a broad-spectrum soil-applied herbicide with a mechanism of action that differs from this product as a foundation in a weed-control program. Do not use more than one application of this or any other herbicide with the same mechanism of action within a single growing season unless mixed with an herbicide with another mechanism of action with an overlapping spectrum for the difficult-to-control weeds.
- If resistance is suspected, treat weed escapes with an herbicide with a different MOA or use non-chemical methods to remove escapes.
- Monitor treated weed populations for loss of field efficacy and for early signs of resistance development.
- Scout field(s) before and after application.
- Report lack of performance to registrant or their representative.

Indicators of possible herbicide resistance include: (1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; (2) a spreading patch of non-controlled plants of a particular weed species; (3) surviving plants mixed with controlled individuals of the same species.

Contact your local sales representative, extension agent, or certified crop advisors to find out if suspected resistant weeds to this MOA have been found in your region. If resistant biotypes of target weeds have been reported, use the application rates of this product specified for your local conditions. Tank mix products so that there are multiple effective mechanisms of action for each target weed.

For further information or to report suspected resistance, contact a Willowood representative at Generic Crop Science at genericcropscience.com.

### Integrated Pest Management

Integrate **Willowood Thio UltraMax** into an overall pest management strategy whenever the use of an herbicide is required. Practices known to aid in pest management include scouting, proper weed identification and proper application timing and should be followed wherever possible. Consult local agricultural or weed control experts for additional IPM strategies established for your area and to understand treatment thresholds and application timing for your area.

### USE INSTRUCTIONS

| CROP | WEEDS   | APPLICATION RATE LIMITATIONS   |
|------|---|--|
| Rice | Barnyardgrass (Watergrass) [Suppression]<br>Smallflower Umbrella plant<br>Sprangletop | [20.0 to 26.7 lbs./A (3 to 4 lbs. thiobencarb a.i./A)]<br>[*23.3 lbs./A (3.5 lbs. thiobencarb a.i./A)– suppression of barnyardgrass only]<br><br>[Use the higher use rate when weed populations are higher or when the weed growth stage is close to the upper application limit.]<br><br>[Use the lower use rate when weed pressure is lower and the weeds are smaller in size.]<br><br>[*The use rate of 23.3 lbs./A provides suppression only of barnyardgrass (watergrass).]<br><br><b>Restrictions:</b><br>- Do not apply more than 26.7 lbs. <b>Willowood Thio UltraMax</b> (4 lbs. thiobencarb a.i./A) per acre per year.<br>- Do not apply more than one application per year. |

### APPLICATION INSTRUCTIONS

Make application after flooding when rice is in the expanded two-leaf stage (first open leaf). Do not make application if rice exhibits signs of stress. The Cal Pearl rice variety may react more adversely to stress conditions than other varieties.

The optimum size for [control] [suppression] of barnyardgrass (watergrass) is when the plant is at the two leaf stage or less. The optimum size for control of smallflower umbrella plant is when the plant is at the three leaf stage or less. For best control, smallflower umbrella plant must be submerged. Decreased weed control may result due to periods of extended weed seed germination caused by cold weather during the planting season.

[Do not drain fields that have been treated with **Willowood Thio UltraMax** for a minimum of 14 days following treatment (19 days for applications east of the Rocky Mountains), except where State regulation may allow shorter water holding periods for hydrologically isolated fields or for fields that are associated with systems designed to isolate discharged water from natural bodies of water. Examples of these systems include: tailwater recovery systems for single or multiple fields, and use of fallow land for ponding discharge water. Contact the Department of Pesticide Regulation for additional information on acceptable water management practices.]

[-or-]

### [APPLICATION INSTRUCTIONS FOR CALIFORNIA ONLY]

[Do not drain fields that have been treated with **Willowood Thio UltraMax** for a minimum of 30 days following treatment, except where the County Agricultural Commissioner may allow shorter water holding periods for hydrologically isolated fields, or for fields that are associated with systems designed to isolate discharged water from natural bodies of water. Examples of these systems include: tailwater recovery systems for single or multiple fields, and use of fallow land for ponding discharge water. Contact the County Agricultural Commissioner for additional information on acceptable water management practices.]

The water level in the checks should be maintained at 3 to 4 inches with no soil exposed. For best weed control, water flow should be maintained at a minimum during and up to four days after treatment.

#### USE RESTRICTIONS

- Do not apply more than one treatment per year.
- Do not plant subsequent crops in treated fields within 6 months of last treatment.
- Do not make application to rice paddies where commercial catfish or crayfish farming will be practiced.
- Do not use on rice fields that are adjacent to catfish or crayfish ponds.
- Do not use water drained directly from treated fields to irrigate other crops.
- Do not apply this product within 24 hours of rainfall, or when heavy rain is expected to occur within 24 hours of application.
- Do not mix, load or handle this product within 100 feet of aquatic habitats.

#### CULTURAL MANAGEMENT PRACTICES

Using **Willowood Thio UltraMax** in rice fields where straw has not been removed and the fields have received high amounts of straw and/or organic matter from spring incorporation may reduce plant stand and yield.

Management practices that help provide soil conditions that are favorable for production of vigorous rice treated with **Willowood Thio UltraMax** include:

- Remove straw, or burn the crop residue (where allowed by State regulation).
- Plow or disc the crop straw in the fall.
- Before final seed bed preparation, but after fall disking or plowing, apply a chemical “burndown” to control actively growing vegetation.
- Maintain flood depth that is uniform at 3 to 4 inches.

Rice fields treated with **Willowood Thio UltraMax** post-flood that are water seeded should be inspected regularly during the tillering stage. If the following symptoms associated with decomposition of crop/weed residues are exhibited: foliage that is dark green, and/or; a reduction in plant height, and/or; deformation of the plant; drain the field immediately (if allowed by the recirculating systems or water impoundment) for 7 to 14 days or until the soil begins to crack. Areas that are low and that do not drain completely may continue to display symptoms.

#### WILLOWOOD THIO ULTRAMAX POST-FLOOD WATER-SEEDED USES - MANAGEMENT PRACTICES

Use of **Willowood Thio UltraMax** in rice fields that develop anaerobic (low oxygen content) soil conditions after planting may reduce plant stand and yield. Anaerobic soil conditions are likely to result when:

1. crop residue and/or green vegetative matter is worked into the soil before planting,
2. soil drainage is slow,
3. there is continuous flood, and
4. areas in the field retain water during periods of prescribed flood removal.

Management practices that will help to reduce anaerobic soil conditions and promote good soil conditions for the production of healthy rice treated with **Willowood Thio UltraMax** include:

- Removing previous crop and weed residues; or
- Destroying the prior crop and weed residues using the following methods:
  - burning (where allowed by state regulation)
  - plowing or disking in the fall and winter
  - following the initial ground preparation (fall and winter plowing) and before final seedbed preparation using a chemical “burndown” (including glyphosate or paraquat) to prevent vegetation buildup.
- Apply fertilizer based on soil test results – do not make application of excess phosphorous.
- If needed, level the field to eliminate low spots and ensure that the field can be entirely drained. Fields that have been precision leveled for perimeter ditches or straight levees are more suited to rapid removal of flood water. When contour levees are used, this is far more difficult to achieve.
- Maintaining a uniform flood depth of 3 to 4 inches.

#### RESTRICTIONS

- Do **NOT** exceed labeled use rates of **Willowood Thio UltraMax**. Calibrate application equipment accurately and minimize or eliminate application overlap.
- Do **NOT** use **Willowood Thio UltraMax** on rice in fields that are water seeded that have been land leveled and have severe cuts and areas that are heavily filled in the past 18 months. This does not apply to normal maintenance leveling. Use in fields with a “loose” seedbed may also result in severe injury.
- Do **NOT** use **Willowood Thio UltraMax** on rice in fields where chicken litter has been applied or had large amounts of green vegetative residue incorporated in the past 10 months.
- Do **NOT** use **Willowood Thio UltraMax** on rice fields that cannot be drained as required due to water holding restrictions. Adverse crop response may result.
- **DO NOT PLANT ADAIR, MILLIE OR L-201 RICE VARIETIES** if a post flood **Willowood Thio UltraMax** program is used in water seeded rice.

Water seeded rice fields that are treated with **Willowood Thio UltraMax** (post-flood) should be inspected on a regular schedule through the stand establishment and tillering stages. If adverse crop response (see Cultural Management Practices above) occur, drain the field immediately (if allowed by the recirculating systems or water impoundment or the field is hydrologically isolated) for 7 to 14 days or until the soil begins to crack to allow the soil to receive oxygen; then reflood. Low spots that do not drain completely may continue to display adverse crop response symptoms.

### STORAGE AND DISPOSAL

**DO NOT** contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Open dumping is prohibited. Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in cool, dry place. Protect from excessive heat.

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

**CONTAINER HANDLING:**

Nonrefillable bag. Do not reuse or refill the bag. Completely empty the bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration.

### IMPORTANT: READ BEFORE USE

#### CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the unopened product container at once. By using the product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood, LLC. To the extent consistent with applicable law, such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD, LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood, LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD, LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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