



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 12, 2019

Jane M. Miller
Agent for Willowood, LLC
Willowood, LLC
c/o Biologic Regulatory Consulting, Inc.
10529 Heritage Bay Blvd.
Naples, FL 34120

Subject: Label Amendment – add professional and collegiate sports fields to use sites and directions for use
Product Name: Willowood Nemamectin 0.7SC
EPA Registration Number: 87290-84
Application Date: August 19, 2019
Decision Number: 554930

Dear Ms. Miller:

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.

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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 Kevin Ulrich by phone at 703-347-0464, or via email at ulrich.kevin@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Benbow".

Gene Benbow, Product Manager 7
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

[Note to reviewer: [Text] in brackets denotes optional text].
[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

{BOOKLET FRONT PANEL LANGUAGE}

RESTRICTED USE PESTICIDE

DUE TO TOXICITY TO NON-TARGET INVERTEBRATES, MAMMALS, AND AQUATIC ORGANISMS 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.

ABAMECTIN	GROUP	6	INSECTICIDE
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Willowood Nemamectin 0.7SC

Nematicide

To control turf-parasitic nematodes on golf course tees, fairways and greens and professional and collegiate sports fields.

ACTIVE INGREDIENT:

Abamectin* 8.0%

OTHER INGREDIENTS: 92.0%

TOTAL: 100.0%

*CAS No. 71751-41-2; 1 Gal. contains 0.7 lb. Abamectin

**KEEP OUT OF REACH OF CHILDREN
WARNING/AVISO**

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.)

See [inside] label booklet for [First Aid,] [additional] Precautionary Statements and Directions for Use.

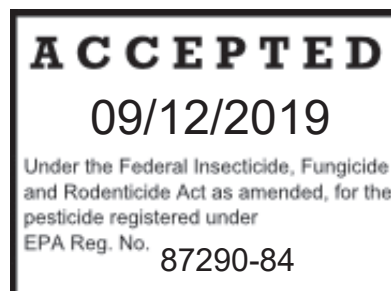
EPA Reg. No. 87290-84

EPA Est. No.

Manufactured for:

Willowood, LLC
385 Interlocken Crescent, Suite 240
Broomfield, CO 80021

Net Contents:



{LANGUAGE INSIDE BOOKLET}

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • 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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
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 treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center (NPIC) at 1-800-858-7378 Mon. - Fri. 8:00 am to 12:00 pm Pacific Time. For emergencies, call the poison control center at 1-800-222-1222.</p>	
NOTE TO PHYSICIAN	
<p>Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Toxicity following accidental ingestion of this product can be minimized by early administration of chemical absorbents (e.g., activated charcoal).</p> <p>If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements.</p> <p>In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.</p>	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING/AVISO

May be fatal if swallowed. May be fatal if inhaled. Do not breathe vapor or spray mist. Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves made out of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride ≥ 14 mils, or viton ≥ 14 mils
- Shoes plus socks

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. 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.

ENGINEERING CONTROLS

When handlers use closed systems, enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Wash thoroughly with soap and water after handling.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife.

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from target areas. Do not contaminate water when disposing of equipment wash water or rinsate. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are foraging in/or adjacent to the treatment area.

Use of this product may pose a risk to threatened and endangered species of fish, amphibians, crustaceans, (including fresh water shrimp), and insects. All use of this product in the state of California should comply with the recommendations of the California Endangered Species Project. Before using this product in California, consult with your county agriculture commissioner to determine use limitations that apply in your area.

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having a medium potential for reaching both surface water and aquatic sediment via runoff for several weeks to months after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of abamectin from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall is forecast to occur within 48 hours.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

Attention: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.

DIRECTIONS FOR USE RESTRICTED USE PESTICIDE

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

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.

FAILURE TO FOLLOW DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR PEST CONTROL, AND/OR ILLEGAL RESIDUES.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not re-enter treated areas until sprays have dried.

PRODUCT INFORMATION

Apply this product as a seasonal program for control of turf-parasitic nematodes on golf course tees, fairways and greens and professional and collegiate sports fields. Apply as an early curative treatment (after nematode extraction, identification and counts has occurred). Improved turf quality may require multiple applications.

Restrictions:

- Do not exceed 0.27 lb. abamectin/calendar year (50 fl. oz. of Willowood Nemamectin 0.7SC per calendar year).
- Only apply this product to golf course tees, fairways and greens. Do not apply this product to golf course roughs, commercial turf, residential turf or sports fields (other than professional or collegiate).
- Apply this product with ground application equipment only. Do not apply by air.
- Do not apply this product through any type of irrigation system.
- Do not apply through an ultra-low volume spray system.
- Do not graze treated turf or feed turf clippings from any treated area to poultry or livestock.
- Do not apply to turf under moisture or heat stress.

APPLICATION EQUIPMENT

When applying this product, use spray nozzles that produce extremely coarse droplets.

MIXING DIRECTIONS

Willowood Nemamectin 0.7SC Alone

Add the label specified amount of product to the spray tank and mix well.

Tank-Mixing Precautions:

- Ensure the chosen tank-mix partner(s) are approved in the state in which they are being used.

Tank-Mixing Restrictions:

- Do not mix with fertilizers, pesticides, or surfactants unless compatibility charts or user history indicates the combinations are compatible under the conditions of use.
- Do not exceed any labeled use rate of this product or any tank-mix partner.
- It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Spray Additives

Use a soil surfactant or soil wetting agent when applying this product. Follow all manufacturer use rates, directions and restrictions.

SPRAY DRIFT MANAGEMENT

AVOIDING SPRAY DRIFT IS THE RESPONSIBILITY OF THE APPLICATOR.

Do not apply when weather conditions favor drift from treated areas to non-target aquatic habitat.

Do not spray when conditions favor drift beyond the intended application area. Conditions that may influence drift include wind speed and direction, temperature inversions, sprayer nozzle/pressure combinations and spray droplet size. Contact your State extension agent for spray drift prevention guidelines for your area.

TURF USE DIRECTIONS

Golf Course Turfgrass (including all cultivars, varieties, and/or hybrids)
Tees, Fairways and Greens and professional and collegiate sports fields

Pest	Application Rate (fl. oz./A)	Application Timing
Turf-parasitic nematodes	3.125-6.25	Make applications at this rate on a 14 to 21-day interval.
	6.25-12.2	Make applications at this rate on a 21 to 28-day interval.
Application Instructions Use the lower application rate for light infestations and the higher listed rate for heavy infestations. Make applications to wet turf. This is accomplished most easily in the early morning while turf is covered with dew or irrigate the application area with 0.1 inches of water prior to application. Apply 0.1 to 0.5 inches of water within 1 hour of application of this product to move it through the thatch. Irrigation before this product has dried on the turf will provide the best results. Make applications in 2 gallons of water per 1,000 square feet of turf. If lower application volumes are used, begin irrigation as soon as possible after application. Applications of this product in combination with an appropriately labeled and compatible soil and/or foliar fungicide may prove beneficial in reducing fungal infections following nematode feeding.		
Restrictions: Do not apply more than 0.067 lb. abamectin/A (12.2 fl. oz. Willowood Nemamectin 0.7SC) per application. Do not apply more than once every 14 days. Do not exceed 0.27 lb. abamectin/calendar year (50 fl. oz. Willowood Nemamectin 0.7SC/A/calendar year).		

CURATIVE SPOT TREATMENTS ON GOLF COURSE TEES, FAIRWAYS AND GREENS

Use curative spot treatments for control of nematodes over smaller areas where outbreaks are severe or expected to become severe. Curative spot treatments are made by applying the highest labeled dose of this product (12.2 fl. oz.) and repeat up to 4 times. Do not make repeat applications sooner than 14 days from the last application. When making curative spot treatments, treat no more than 10,000 sq. ft. per acre per year.

Curative Spot Treatment Use Restrictions:

- Do not apply within 25 feet of aquatic habitats (such as, but not limited to, lakes; reservoirs; rivers; permanent streams; marshes or ponds; estuaries; and commercial fish farm ponds.
- Do not apply when heavy rainfall is forecast.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

Store in a tightly closed container in a cool, dry place.

PESTICIDE DISPOSAL:

Pesticide waste may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use 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.

CONTAINER HANDLING:

Nonrefillable Container (five gallons or less): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incineration.

Nonrefillable Container (greater than five gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 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. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or incineration.

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 product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Willowood, LLC or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Willowood, LLC and Seller harmless for any claims relating to such factors.

Willowood, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Willowood, LLC, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, neither Willowood, LLC nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF WILLOWOOD, LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING**

FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF WILLOWOOD, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Willowood, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Willowood, LLC.

[EPA approval date]

{LANGUAGE ON LABEL AFFIXED TO CONTAINER}

RESTRICTED USE PESTICIDE

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Willowood Nemamectin 0.7SC

ACTIVE INGREDIENT:

Abamectin*.....8.0%

OTHER INGREDIENTS:.....92.0%

TOTAL:.....100.0%

*CAS No. 71751-41-2; 1 Gal. contains 0.7 lb. Abamectin

**KEEP OUT OF REACH OF CHILDREN
WARNING/AVISO**

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FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • 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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
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 treatment advice.
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NOTE TO PHYSICIAN

Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Toxicity following accidental ingestion of this product can be minimized by early administration of chemical absorbents (e.g., activated charcoal).

If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper

respiratory functionality) as indicated by clinical signs, symptoms, and measurements.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING/AVISO**

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **PESTICIDE STORAGE:** Store in a tightly closed container in a cool, dry place.

PESTICIDE DISPOSAL: Pesticide waste may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use 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.

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See label booklet for additional Precautionary Statements and Directions for Use.

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EPA Est. No.

Manufactured for:

Willowood, LLC
385 Interlocken Crescent, Suite 240
Broomfield, CO 80021

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