10/3/2011



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

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

> > OCT - 3 2011

Willowood Clethodim, LLC c/o Ann Tillman Pyxis Regulatory Consulting 4110 136<sup>th</sup> St. N.W. Gig Harbor, WA 98332

Gentlemen:

Subject: Label Revisions Willowood Clethodim MUP EPA Registration No. 87812-1 Your Submission Dated July 22, 2011

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

Kathryn V<sup>I</sup>. Montague Product Manager 23 Herbicide Branch Registration Division (7505P)

Enclosure

|   |   |   |   |   | (                 |   |                                    |                            | ړد                            |  |
|---|---|---|---|---|-------------------|---|------------------------------------|----------------------------|-------------------------------|--|
|   | ions on reverse before compreting form.<br>United States<br>Environmental Protection Ag<br>Washington, DC 20460 |   |   | Registra  |                   | ation   |                                    |                            |                               |  |
|   | A   | pplicatior  | n for Pestic  | ide - Sect  | lion              | ī   |                                    |                            |                               |  |
| 1. Company/Product Number<br>87812-1  |   |   |   | 2. EPA Product Manager<br>K. Montague   |                   |   | 3. P                               | 3. Proposed Classification |                               |  |
| 4. Company/Product (Name<br>Willowood Clethodim, LL   |   | MUP   | PM#   | 2   | 23                |   |                                    |                            |                               |  |
| 5. Name and Address of Ap<br>Willowood Clethodim, LL<br>c/o Pyxis Regulatory Con<br>4110 136th St. NW<br>Gig Harbor, WA 98332 | .C  | Ð   | (b)(i),<br>to:<br>EPA                                   | my product i<br>Reg. No. 4  | s sim<br>275      | nilar or ident  | ical in co                         |                            | ction 3(c)(3)<br>and labeling |  |
|   |   |   | Section -   |   |                   |   |                                    | <u> </u>                   |                               |  |
| Amendment - Explain below.         Resubmission in response to Agency letter dated         Notification - Explain below.      |   |   |   | Final printed labels in repsonse to<br>Agency letter dated<br>"Me Too" Application.<br>Other - Explain below. |                   |   |                                    |                            |                               |  |
| Explanation: Use addition   |   |   |   |   |                   |   | <del></del>                        |                            |                               |  |
|   |   | <u>.</u>  | Section -   | <u>IN</u>   |                   |   |                                    |                            |                               |  |
| 1. Material This Product Wi<br>Child-Resistant Packaging<br>Yes<br>No      Certification must<br>be submitted                 | II Be Packaged In:<br>Unit Packaging<br>Yes<br>No<br>If "Yes"<br>Unit Packaging wgt.                            | No. per<br>container                              | Water Soluble I<br>Yes<br>No<br>If "Yes"<br>Package wgt | Packaging<br>No. per<br>container   |                   | 2. Түре of  | Metal<br>Plastic<br>Glass<br>Paper | Specify)                   |                               |  |
| 3. Location of Net Contents Information 4. Size(s) Re           Label         Container                                       |   |   | ail Container 5. Location of Label                      |   |                   |   | Directions<br>companying product   |                            |                               |  |
| 6. Manner in Which Label is   | s Affixed to Product  | Lithogra<br>Paper gl<br>Stencile                  | ph<br>ued   | Other   |                   |   |                                    | · ·                        | - [                           |  |
| <u> </u>  |   |   | Section - I   | V   |                   |   |                                    |                            |                               |  |
| 1. Contact Point <i>(Complete</i>   | e items directly below for  | identification                                    |   |   | if nec            | essary, to pro  | ocess this                         | application                | .)                            |  |
| Name<br>Pyxis Regulatory Consulting, Inc.   |   |   | Title<br>Agent  |   |                   | Telephone No. (ińciude Area Code)<br>(253)-853-7369-ຼ້ະ |                                    |                            |                               |  |
| I certify that the state<br>I acknowledge that a<br>both under applicable   | ements I have made on th<br>ny knowlinglly false or mi<br>I law.  | Certificati<br>nis form and al<br>isleading state | ll attachments th                                       | nereto are true<br>nishable by fir  | , acci<br>ne or i | urate and con<br>imprisonment                           | nplete.<br>t or                    | Roceive<br>(St             | amped)                        |  |
| Signature Alban<br>Forz:  |   |   | 3. Title<br>Agent                                       |   |                   |   |                                    | ι.                         | ι ιιιι<br>ι ιι<br>ιι<br>ι     |  |
|   |   |   | Date 73   | · 7/22/2011.  |                   |   |                                    | ι<br>( ι ( ι<br>ί          | (<br>( (                      |  |

Yellow - Applicant Copy

# PYX1S REGULATORY CONSULTING, INC.

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July 22, 2011

# OVERNIGHT DELIVERY

Katherine Montague (PM 23) Document Processing Desk (AMEND) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 S. Crystal Drive Arlington, VA 22202

RE: Willowood Clethodim, LLC Willowood Clethodim MUP (EPA Reg. No. 87812-1) Label Amendment

Dear Ms. Montague,

On behalf of Willowood Clethodim, LLC, we are submitting an amendment to add new uses. These same uses are found on the label for Clethodim 37% MUP (EPA Reg. No. 42750-84). In support of this application, we submit the following manufacturing use product documents:

- 1. Application for Amendment (EPA Form 8570-1)
- 2. One (1) copy of the amended label with changes tracked
- 3. Three (3) copies of the amended label with changes incorporated
- 4. A CD containing an electronic version of the proposed labeling
- 5. Certification with Respect to Label Integrity
- 6. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 7. Agency Internal Use Copy of the Data Matrix
- 8. Public File Copy of the Data Matrix
- 9. Letter of Authorization

No data are being submitted with this amendment, and no data are needed to be reviewed to approve the proposed labeling. Willowood Clethodim, LLC believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

We trust you will find this application complete. However, please feel free to contact me ((253): 853-7369, <u>Ann@PyxisRC.com</u>) if you have any questions or need any additional information.

Sincerely,

Ann M. Tillman

Enclosures

# WILLOWOOD CLETHODIM MUP

| FOR USE IN FORMULATING HERBICIDES ONLY  | Under the Science inercucide,<br>Princhalon, and a conditioned Act,<br>an extended, in the pesticide<br>regulation of states<br>EPA Reg. Vo 87812-1 |
|---|---|
| ACTIVE INGREDIENT:<br>Clethodim [(E)-2[1-[[(3-chloro-2-propenyl)oxy]imino]propyl]-3-hydroxy-2-cyclohexen- | 1-  |
| one<br>OTHER INGREDIENTS  |   |
| TOTAL.  |   |

Contains petroleum distillates

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

|                            | FIRST AID  |
|----------------------------|--|
| IF SWALLOWED               | <ul> <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 the poison control center or</li> </ul>                  |
|                            | <ul> <li>doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>   |
| IF IN EYES:                | <ul> <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<br>CLOTHING: | <ul> <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>   |
|                            | estion of this product or subsequent vomiting can result in aspiration of light<br>ich can cause pneumonitis. If ingested, probably mucosal damage may<br>e of gastric lavage.   |
| For MEDICAL Emerger        | ncies call the National Pesticide Information Center 24-hours a day at 1-800-858-<br>t container or label with you when calling a Poison Control Center or doctor or   |

See back panel of label for additional PRECAUTIONARY STATEMENTS.

EPA Reg. No. 87812-1

EPA Est. No.

Manufactured for: Willowood Clethodim, LLC 1600 NW Garden Valley Blvd. Roseburg, OR 97471

Net Contents: xx gals.

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# PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and 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 in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

#### **DIRECTIONS FOR USE**

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

This product may only be used to formulate end-use products with the following uses:

Terrestrial Food Uses:

- Crop Subgroup 1B: Root Vegetables (except Sugar Beet)
- Crop Subgroup 1C: Tuberous and Corm Vegetables
- Crop Group 2: Leaves of Root and Tuber Vegetables
- Crop Group 3: Bulb Vegetables
- Crop Subgroup 4A: Leafy Greens
- Crop Subgroup 4B: Leaf Petioles
- Crop Subgroup 5A: Head and Stem Brassica
- Crop Subgroup 5B: Leafy Brassica Greens
- Crop Group 6: Legume Vegetables (Dried and Succulent), except soybean
- Crop Group 8: Fruiting Vegetables (except Cucurbit)
- Crop Subgroup 9A: Melon
- Crop Subgroup 9B: Squash/Cucumber
- Crop Subgroup 13-07A: Caneberry
- Crop Subgroup 13-07B: Bushberry
- Crop Subgroup 19A: Herbs

Individual crops: alfalfa; artichoke (Globe), asparagus, canola, clover, cotton, cranberry, flax, hops, mint, mustard seed, onions (dry bulb, green), peach; peanut (including perennial), safflower, sesame, soybean, strawberry, sugar beet, sunflower, and turnip

#### Other Uses:

- Greenhouses, Shadehouses, Lathhouses
- Golf courses
- Nurseries
- Outdoor non-food uses
- Native prairie warm season grass restoration projects
- Niger seed (*Guizotia abyssinica*) grown for use as wild bird feed
- Ornamentals
- Non-bearing food crops (including but not limited to apples, berries, cherry (sweet), citrus, trus, trus, trus, arapes, olives, peaches, pears, prunes, stone fruit, strawberries, tree nuts (including but not limited to almond, filbert, pecan, pistachio, walnut)
- Conifer trees
- Fallow land and other non-producing agricultural areas

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- Non-crop or non-planted areas
- Uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration
- Uses for experimental purposes that are in compliance with EPA 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:

**Nonrefillable container.** Do not reuse or refill this container. Offer for recycling if available. **Refillable container**. Refill this container with clethodim only. Do not reuse this container for any other purpose. For final disposal, offer for recycling or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, 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]

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