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1/4



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

FEB 14 2013

Ann M. Tillman  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Dear Ms. Tillman:

SUBJECT: Confidential Statement of Formula (CSF) Alternate Formulations #1 and #2  
Willowood Clethodim MUP  
EPA Registration No. 87812-1

The CSF amendment referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. In addition, a revised stamped accepted label is also enclosed, reflecting the changes requested by the Agency during the course of this review. A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment. This amended labeling supersedes all previously accepted labeling. Additionally, the storage stability and corrosion data submitted for this product (MRID # 488874-01), have been reviewed and found acceptable.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure

2/4

ACCEPTED

FEB 14 2013  
EPA  
For the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
Title 40, Chapter I, Subchapter B, Part 152, Section 152.101  
87812-1

### WILLOWOOD CLETHODIM MUP FOR USE IN FORMULATING HERBICIDES ONLY

**ACTIVE INGREDIENT:**

Clethodim [(E)-2[1-[[[(3-chloro-2-propenyl)oxy]imino]propyl]-3-hydroxy-2-cyclohexen-1-one].....	37.0%
OTHER INGREDIENTS.....	63.0%
TOTAL.....	100.0%

Contains petroleum distillates

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not give any liquid to the person.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
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>
<p>Note to Physician: Ingestion of this product or subsequent vomiting can result in aspiration of light hydrocarbon liquid, which can cause pneumonitis. If ingested, probably mucosal damage may contraindicated the use of gastric lavage.</p>	
<p>For MEDICAL Emergencies call the National Pesticide Information Center 24-hours a day at 1-800-858-7378. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.</p>	

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.

**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, fruits, grapes, 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

- 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]