



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 29, 2019

Anna Armstrong  
Agent for Willowood Fomesafen, LLC  
Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707

Subject: Notification per PRN 98-10 – Minor Label Revisions  
Product Name: Willowood Fomesafen Technical Herbicide  
EPA Registration Number: 88024-1  
Application Date: 10/09/2019  
Decision Number: 556390

Dear Ms. Armstrong:

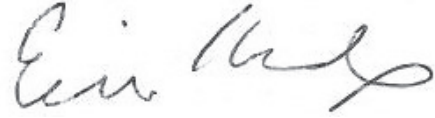
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact please contact Marc Sheahin at 703-347-8639 or by email at [sheahin.marc@epa.gov](mailto:sheahin.marc@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft". The signature is fluid and cursive, with the first name "Erik" being more legible than the last name "Kraft".

Erik Kraft, Product Manager 24  
Fungicide and Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

[MASTER LABEL]

# Willowood Fomesafen Technical Herbicide

Formulating Use Only

**Active Ingredient:**

Fomesafen\* ..... 98.8%

**Other Ingredients:** ..... 1.2%**Total:** ..... **100.0%**

\*CAS No. 72178-02-0

## KEEP OUT OF REACH OF CHILDREN DANGER/PELIGRO

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 15-20 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 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>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 15-20 minutes.</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 by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>EMERGENCY NUMBERS</b>	
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 at <b>1-800-424-9300</b> .	

[See [\[Side\]](#)[\[Back\]](#) Panel for [First Aid](#), Precautionary Statements, Directions For Use, and Storage and Disposal.]

EPA Reg. No. 88024-1

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

~~kg~~ \_\_\_\_\_ [Lbs./Kg]**NOTIFICATION**

88024-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

10/29/2019

Net Contents: ~~1102 pounds~~ (500

**Manufactured [For] [By]:**  
Willowood Fomesafen, LLC  
385 Interlocken Crescent, Suite 240  
Broomfield, CO 80021

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**DANGER/PELIGRO**

**CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. DUE TO CORROSIVE NATURE, MAY BE HARMFUL OR FATAL IF SWALLOWED. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN.** Do not get in eyes, on skin or on clothing. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Manufacturers and other handlers must wear:

- Coveralls
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

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

**USER SAFETY RECOMMENDATIONS**

**Users should:**

- ~~Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.~~
- Remove clothing 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**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other 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.

**DIRECTIONS FOR USE**

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

Formulators using this product are responsible for obtaining EPA registration for their formulated products.

Only for formulation into an herbicide for the following uses:

- **TERRESTRIAL - FOOD:** Soybeans, Cotton, Dry Beans, Snap Beans
- Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- Uses for experimental purposes that are in compliance with U.S. EPA requirements.

**STORAGE AND DISPOSAL**

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

**Pesticide Storage:**

Store above 32°F in original containers only. If product freezes, return to room temperature and agitate to reconstitute. Keep container closed when not in use. Do not store near food or feed. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste area.

**Pesticide Disposal:**

Pesticide wastes are acutely 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. Open dumping is prohibited.

**Container Handling:**

[Non-refillable Plastic Containers (Capacity Equal to or Less than 50 Pounds): Do not reuse or refill this container. 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 ¼ 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 or more times. Offer for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]

[Non-refillable Plastic Containers (Capacity Equal to or more than 50 Pounds): Do not reuse or refill this container. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank. Hold container upside down over application

equipment or a mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.]

**[Non-refillable Paper or Plastic Bags, Fiber Sacks including Flexible Intermediate Bulk Containers (FIBC) or Fiber Drums with Liners.** Do not reuse or refill this container. Completely empty paper or plastic bag, fiber sack or drum liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or manufacturing equipment. Then offer for recycling if available or dispose of empty paper or plastic bag, fiber sack or fiber drum and liner in a sanitary landfill, or by incineration. Do not burn, unless allowed by State and local ordinances.]

**[Refillable Fiber Drums With Liners: Refillable container (fiber drum only).** Refilling Fiber Drum: Refill this fiber drum with Rotam Abamectin Technical containing Abamectin only. Do not reuse this fiber drum for any other purpose. Cleaning before refilling is the responsibility of the refiller. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or manufacturing equipment.]

**[Disposing of Fiber Drum and/or Liner:** Do not reuse this fiber drum for any other purpose other than refilling Willowood Fomesafen Technical. Cleaning the container (liner and/or fiber drum) before final disposal is the responsibility of the person disposing of the container. Offer the liner for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner. To clean the fiber drum before final disposal, completely empty the fiber drum by shaking and tapping sides and bottom to loosen clinging particles. Empty residual into application or manufacturing equipment. Offer for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.] **NONREFILLABLE CONTAINER (Plastic):** Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**NONREFILLABLE CONTAINER (Bags):** Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**REFILLABLE CONTAINER:** Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Do not refill or transport damaged or leaking container.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

## CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

### **IMPORTANT: READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this 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 Fomesafen LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD FOMESAFEN 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 Fomesafen 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 FOMESAFEN LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

**LIMITATIONS OF LIABILITY:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD FOMESAFEN LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

**Manufactured for:**  
Willowood Fomesafen, LLC

1600 NW Garden Valley Blvd. Suite 130  
Roseburg, OR 97471