



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 2, 2018

Mr. Robert Hawk
Agent
Orion GFS, LLC
11230 E. Del Norte
Yuma, AZ 85367-7355

Subject: Label Amendment – minor label changes
Product Name: Glufosinate-Ammonium Technical
EPA Registration Number: 88685-3
Application Date: September 15, 2017
Decision Number: 534704

Dear Mr. Hawk:

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.

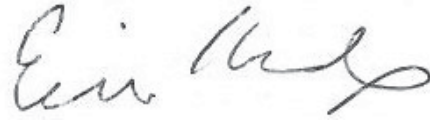
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

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

Page 2 of 2
EPA Reg. No. 88685-3
Decision No. 534704

with FIFRA section 6. If you have any questions, please contact BeWanda Alexander by phone at (703)347-0313, or via email at alexander.bewanda@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft". The signature is written in a cursive style with a large, sweeping flourish at the end.

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

attachment

GLUFOSINATE-AMMONIUM TECHNICAL

A Herbicide For Formulation Purposes Only

ACTIVE INGREDIENT:

Glufosinate-ammonium:

ammonium 2-amino-4(hydroxymethylphosphinyl)butanoate [CAS No. 77182-82-2].....96.3%

OTHER INGREDIENTS:3.7%

TOTAL100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

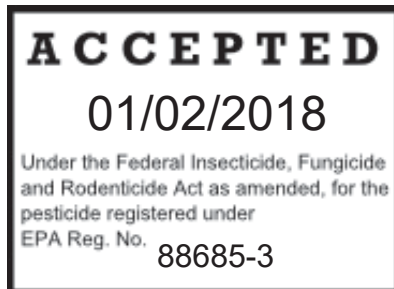
FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call a Poison Control Center or doctor immediately for treatment advice. • Have a person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the Poison Control Center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin	<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 physician for treatment advice.
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 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.
<p>Note to Physician: Glufosinate-ammonium is a glutamine synthetase inhibitor and can interfere with neurotransmitter function. Symptoms may be delayed by up to 48 hours following ingestion. There is no specific antidote. If ingested, endotracheal intubation and gastric lavage should be performed as soon as possible followed by charcoal and sodium sulfate administration.</p>	
<p>For medical emergencies call the National Poison Control Center 1-800-222-1222. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.</p>	

For MEDICAL emergencies call the National Poison Control Center at 1-800-222-1222 and for TRANSPORTATION emergencies call Chemtrec at 1-800-424-9300.

Manufactured for:

Orion GFS, LLC
 12230 E. Del Norte
 Yuma, AZ 85367
 tel. 928-342-3489

EPA Registration No. 88685-3
EPA Est. No. _____
Net Contents: 55 lb (25 kg)



PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION

Harmful if swallowed or absorbed through skin or inhaled. Avoid breathing dust. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse. Wear protective eyewear.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or 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 mix or allow coming in contact with oxidizing agents. Hazardous chemical reaction may occur.

DIRECTIONS FOR USE

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

This product may be used only to formulate end-use products:

(1) with the following uses:

- weed control of emerged weeds in noncrop areas
- control of weeds and grasses in industrial areas
- weed control in citrus fruit (Crop Group 10-10), pome fruit (Crop Group 11-10), stone fruit (Crop Group 12-12), berries, canola, corn, cotton, grapes, olives, soybeans, sugar beets, and tree nuts (Crop Group 14) including pistachios
- weed control prior to emergence of canola, sweet corn, corn, cotton, soybean and sugar beets
- post emergence weed control in cotton using a hooded sprayer
- desiccation of potato vines
- weed control in canola, corn, cotton, soybeans and sugar beets containing the LibertyLink trait
- for elimination of canola, corn, soybean, and cotton plants in seed production not containing the LibertyLink trait;

(2) uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration;

(3) specific uses not listed on the manufacturing product label if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding support of such uses; and

(4) 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 and disposal.

Pesticide Storage: Store in original container tightly closed and in a safe place.

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 container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. Offer the drum for recycling, if available.

CONDITIONS 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. The Directions for Use of this product reflect the opinion of experts based on field use and tests. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ORION GFS, LLC or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of ORION GFS, LLC and 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 ORION GFS, LLC and Seller harmless for any claims relating to such factors.

ORION GFS, 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 conditions not reasonably foreseeable to or beyond the control of Seller or ORION GFS, LLC, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ORION GFS, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, ORION GFS, LLC or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ORION GFS, 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, AT THE ELECTION OF ORION GFS, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT, OR COMPENSATION LIMITED TO DAMAGES NOT EXCEEDING THE FAIR MARKET PURCHASE PRICE, AND SHALL NOT INCLUDE INCIDENTAL OR CONSEQUENTIAL DAMAGES.**

ORION GFS, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of ORION GFS, LLC.