



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 2, 2020

Jesse Lollis  
Regulatory Consultant  
Willowood Glufosinate `Ammonium Technical LLC  
c/o Pyxis Regulatory Consulting Inc.  
4110 136<sup>th</sup> St Ct. NW  
Gig Harbor, WA 98332

Subject: Registration Review Label Mitigation for Glufosinate  
Product Name: WILLOWOOD AGRO GLUFOSINATE-AMMONIUM  
TECHNICAL  
EPA Registration Number: 89707-1  
Application Dates: May 7, 2018  
Decision Numbers: 568150

Dear Jesse Lollis:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Glufosinate Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label 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.

Page 2 of 2  
EPA Reg. No. 89707-1  
Decision No. 568150

If you have any questions about this letter, please contact Jaclyn Pyne by phone at 703-347-0445, or via email at [pyne.jaclyn@epa.gov](mailto:pyne.jaclyn@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

# WILLOWOOD GLUFOSINATE-AMMONIUM TECHNICAL

Only For Use in the Manufacture of Herbicides

## ACTIVE INGREDIENT:

Glufosinate-ammonium\*: ammonium 2-amino-4(hydroxymethylphosphinyl)butanoate)..... 95.5%

**OTHER INGREDIENTS:** ..... 4.5%

**TOTAL** ..... 100.0%

\*CAS No. 77182-82-2

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

First Aid	
<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 the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<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 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 further treatment advice.</li></ul>
<b>Note to Physician:</b> 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.	
<b>Hot line number:</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call the National Pesticide Information Center at 1-800-858-7378.	

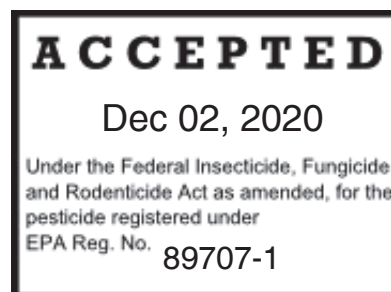
**Manufactured in China for:**  
Willowood Glufosinate, LLC  
385 Interlocken Crescent, Suite 240  
Broomfield, CO 80021

**EPA Reg. No. 89707-1**  
**EPA Est. No.**  
**Net Weight:**  
**Batch No. See container**

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION.** Harmful if swallowed, absorbed through the skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust. 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 before reuse.



## 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 effluents containing this product or 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.**

This product is intended for formulation into end-use products for the following uses:

- (1) weed control of emerged weeds in noncrop areas; control of weeds and grasses in residential lawns and industrial areas; weed control in berries (Crop Subgroup 13B), canola, citrus fruit (Crop Group 10-10), corn (field and sweet), cotton, grapes, olives, pome fruit (Crop Group 11-10), , soybeans, sugar beets, tree nuts (Crop Group 14) including pistachios, salal, stone fruit (Crop Group 12-12); desiccation of potato vines; weed control in glufosinate-ammonium tolerant canola, corn, cotton, soybeans and sugar beets; for elimination of non-glufosinate-ammonium tolerant corn, soybean, and cotton plants in seed production;
- (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 or 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 or disposal.

**Pesticide Storage:** Store in a cool, dry place and in such a manner as to prevent cross-contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area. Handle and open container in a manner as to prevent spillage. Refer to Precautionary Statements on label for hazards associated with handling of this material.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility.

**Container Disposal: DRUM WITH INNER LINER: NONREFILLABLE CONTAINER:** Do not reuse or refill this container. **INNER LINER:** Completely empty removable liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then dispose of empty liner in a sanitary landfill or by incineration or, if allowed by state and local authorities by burning. If burned, stay out of smoke. **DRUM:** Offer for recycling if available or dispose of drum in a sanitary landfill or by incineration 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 in the same manner required for its liner.

**SUPERSACK: NONREFILLABLE CONTAINER:** Do not reuse or refill this container. Completely empty bag into formulation equipment. Then dispose of empty bag in a sanitary landfill or by incineration, 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 Approved ]