



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 30, 2015

Willowwood Sulfentrazone LLC
c/o James Wagner
Wagner Regulatory Associates
PO Box 640
7217 Lancaster Pike, Suite A
Hockessin, DE 19707

Subject: Label Amendment – Me-too addition of Apples
Product Name: WILLOWOOD SULFENTRAZONE TECHNICAL HERBICIDE
EPA Registration Number: 91459-1
Application Date: 10/12/15
Decision Number: 510290

Dear Mr. Wagner:

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.

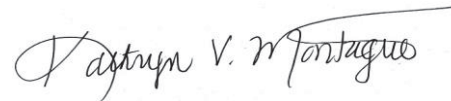
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded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

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with FIFRA section 6. If you have any questions, you may contact Dominic Schuler at 703-347-0260 or via email at schuler.dominic@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn V. Montague". The signature is written in black ink and is positioned above the typed name.

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Willowood Sulfentrazone Technical Herbicide

Formulating Use Only

Active Ingredient:

Sulfentrazone: *N*-{2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1*H*-1,2,4-triazole-1-yl]phenyl}methanesulfonamide..... 95.0%

Other Ingredients: 5.0%

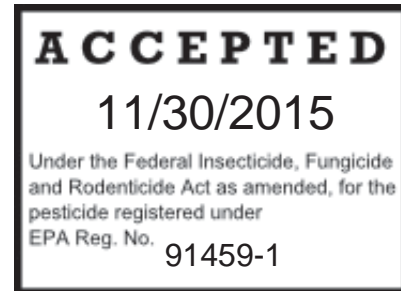
Total: 100.0%

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**

See Additional Precautionary Statements and Directions for Use on label.

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 EPA Est. XXXX

Net Contents: 110 pounds (50 kg), 55 pounds (25 kg)



FIRST AID	
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 treatment advice.
If on skin or clothing	<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 doctor for 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.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
EMERGENCY NUMBERS	
For 24 Hour Medical Emergency Assistance (Human or Animal), Call 1-800-222-1222 . For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call ChemTrec at 1-800-424-9300 .	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

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

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.

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.

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:** Apples, Asparagus, Berry Crop Group 13; Brassica head and stem subgroup 5A; Brassica leafy greens subgroup 5B; Cabbage; Citrus Crop Group 10; Dry Bean; Dry Pea; Field Corn; Flax; Horseradish; Melon subgroup 9A; Mint; Vegetable corm and tuberous subgroup 1C; Vegetable fruiting subgroup 8; Okra; Peanuts; Pea, Succulent; Pistachio; Rhubarb; Soybeans; Succulent Cowpea; Succulent Lima Bean; Sugarcane; Sunflower subgroup 20B; Tobacco; Tree Nut Crop Group 14; Turnips; Spring Wheat; Turf; and Vegetable Soybean (edamame).
- Uses for which USEPA 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 USEPA requirements.

STORAGE AND DISPOSAL

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

Pesticide Storage:

Do not store below 25°C. Store in original container only. Product may crystallize at temperatures below 25°C (77°F). If product crystallizes, the material may be melted at room temperatures not to exceed 85°C (185°F). Keep container closed when not in use. Do not store near food or feed. Store in a dry area and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers. In case of spill, avoid contact, isolate area, and keep animals and unprotected persons out of the area. To confine spills, dike surrounding area or absorb with sand, cat litter, or commercial clay. Place damaged package in a holding container and identify the contents.

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:

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

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 Sulfentrazone 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 SULFENTRAZONE 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 Sulfentrazone 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 SULFENTRAZONE 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 SULFENTRAZONE LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

Manufactured for:
Willowood Sulfentrazone, LLC
1600 NW Garden Valley Blvd. Suite 130
Roseburg, OR 97471