



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 13, 2020

Alexis B. Bromley
Regional Regulatory Manager
UPL Delaware, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Subject: Notification per PRN 98-10 – Updated Company Name, Contact Info, Container
Handling and Warranty Statements; Minor Edits
Product Name: Clopyralid Technical
EPA Registration Number: 91813-23
Application Date: February 26, 2020
Decision Number: 561548

Dear Ms. Bromley:

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 (FIFRA) 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, please contact Aleah Holt at 703-347-0482 or by email at holt.aleah@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish
Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

NOTIFICATION

91813-23

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:

05/13/2020

Notification 2/26/2020

Clopyralid Technical

For Manufacturing Use Only

ACTIVE INGREDIENT:

Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid 96.0%

OTHER INGREDIENTS: 4.0%

TOTAL 100.0%

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KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID	
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 physician for treatment advice.
If Swallowed:	<ul style="list-style-type: none">Call a physician or poison control center 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 poison control center or physician.Do not give anything by mouth to an unconscious person.
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, mouth-to-mouth, if possible.Call a poison control center or physician for treatment advice.
If on Skin or Clothing:	<ul style="list-style-type: none">Take off contaminated clothing.Wash skin with plenty of water for 15-20 minutes.Call a poison control center or physician for treatment advice.
Note to Physician: 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. You may also contact Rocky Mountain Poison and Drug Safety at 1-866-673-6671.	

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Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Deleted: For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC at 1-800-¶ 424-9300.

Deleted: See side panel for additional precautionary statements....

Deleted: Manufactured For:¶

Deleted: 70506-93

Deleted: United Phosphorus, Inc. 423 Riverview Plaza¶ Trenton, NJ 08611

Deleted: 1-800-247-1557 • www.upi-usa.com¶

UPL DELAWARE, INC.
630 Freedom Business Center Dr.
King of Prussia, PA 19406

EPA Reg. No. 91813-23
EPA Est. No.

Net Weight:

[Notification 2/26/2020](#)

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals
DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin or inhaled. Do not get in eyes or on skin and clothing. Wear goggles or face shield when handling. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product 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.

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 formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

Agricultural Uses

Asparagus, barley, broccoli, broccoli raab, Brussels sprouts, cabbage, canola, cauliflower, Chinese cabbage, Chinese broccoli, collards, com, fallow land, garden beets, grasses, kale, kohlrabi, mint, mizuna, mustard greens, mustard spinach, oats, pasture, rangeland, rape greens, spinach, stone fruits, sugar beets, tree plantations, turnips, and wheat.

This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult [UPL DELAWARE, INC.](#) for instructions for formulation and other information.

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Non-Agricultural Uses

For manufacture of herbicides for use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial manufacturing and storage sites, non-cropland, parks, rights-of-way, sod farms and roadsides; grass grown for seed; select ornamental plantings in landscapes and nurseries, forest sites; CRP acres. This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such uses(s). Consult [UPL DELAWARE, INC.](#) for instructions for formulation and other information.

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This product must not be formulated into manufacturing-use products or end-use products for use on residential turf.

If the product is labeled for reformulation into products bearing labeling for turf applications other than residential turf, the formulated product label must contain the following statements:

- Do not use on residential turf.
- Do not send clippings to a compost facility
- Do not collect grass clippings for mulch or compost.
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store in a cool, dry, well-ventilated 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.

CONTAINER HANDLING

Non-refillable 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 formulation equipment. If not emptied in this manner, the liner may be considered an acute hazardous waste and disposed in accordance with local, state, and federal regulations.

When completely empty, offer for recycling, if available, or dispose of liner 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 or other outer container is contaminated and cannot be reused, dispose of in the manner required for its liner.

(Optional container handling for rigid containers greater than 5 lbs)

Nonrefillable container. Do not reuse or refill this container. Clean promptly after emptying.

Triple rinse or pressure rinse as follows:

Triple rinse: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container back on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use and disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Do not cut or weld metal containers.

Pressure rinse: Empty the remaining contents into application equipment or a mix tank and rinse to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or 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 flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

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**CONDITIONS OF SALE
AND LIMITATION OF WARRANTY AND LIABILITY**

UPL DELAWARE, INC. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it is reasonably fit for the purposes referred to in the Directions for Use, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

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To the extent allowed by applicable law, UPL DELAWARE, INC. 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. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.