



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 25, 2024

SENT BY EMAIL

Robert Avalos
robert.avalos@atticusllc.com
ZENAVIS, LLC

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Primary brand name change
Product Name: ZEN CLOPYRALID TECHNICAL
Admin Number: 103050-9
EPA Receipt Date: 09/06/2024
Action Case Number: 00628709

Dear Robert Avalos:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA 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 labeling submitted with this application has been stamped "Notification" and will be placed in our records.

The primary brand name of this product has been changed from ARG Clopyralid Technical to ZEN Clopyralid Technical, and our records have been updated accordingly.

Should you wish to add/retain a reference to your 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 EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Margaret Golembiewski via email at golembiewski.margaret@epa.gov.

Sincerely,

Kable Bo Davis

Kable Bo Davis, Senior Advisor
HB, RD
Office of Pesticide Programs

ARG-ZEN Clopyralid Technical
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT: Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid

OTHER INGREDIENTS:	96.97%
	3.3%
	100.0%

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	
If in Eyes:	- 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 on Skin:	- 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 Inhaled:	- 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.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-866-257-4118 for emergency medical treatment information.	

For Chemical Spill, Leak, Fire, or Exposure, call: CHEMTREC 1-800-424-9300

Manufactured for:
ArgheZenavis, LLC
5000 CentreGreen Way, Suite 400940 NW Cary Parkway, Suite 200
Cary, NC 27513

EPA Reg. No. 87373-408103050-9
EPA Est. No.
Net Weight: lbs (kg)
Lot No.: see container

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Corrosive – Causes Irreversible Eye Damage – Harmful If Absorbed Through Skin Or Inhaled
Avoid contact with skin, eyes or clothing. Do not get in eyes or on clothing. Wear goggles or face shield when handling.
Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before use.

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

Apple, asparagus, barley, *Brassica* head and stem subgroup 5A, *Brassica* leafy greens subgroup 5B, bushberries subgroup 13-07B, com (field, pop, sweet), cranberry, fallow land, garden beet, grasses, hops, mint (peppermint and spearmint), oats, pasture, rangeland, rapeseed subgroup 20A except gold of pleasure, sod farms, spinach, stone fruit crop group 12, strawberry, sugar beets, Swiss chard, left, tree plantations, tumpip (greens and roots) 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 Greenfields Marketing, Ltd. For instructions for formulation and other information.

NON-AGRICULTURAL USES

For use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides. Turfgrass and lawn uses are restricted to non-residential sites.

Note: In the states of California, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only. 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 Greenfields Marketing, Ltd. For formulation and other information.

This product must not be formulated into manufacturing-use herbicide products or end-use herbicide 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 label must contain the following statements:

Use Restrictions

- Do not use on residential turf.
- Do not send grass 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.
- In the states of California, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only.

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 DISPOSAL: 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.

CONDITION 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 Direction for Use of this Product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, presence of other materials or other influencing factors in the use of the product, which are beyond the control of **ArgheZenavis, LLC** or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold **ArgheZenavis, LLC** and Seller harmless for any claims relating to such factors. **ArgheZenavis, 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 abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or **ArgheZenavis, LLC**, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, **ARGHEZENAVIS, LLC** MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE. To the extent consistent with applicable law, neither **ArgheZenavis, LLC** nor Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF **ARGHEZENAVIS, 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 THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF **ARGHEZENAVIS, LLC** OR SELLER, THE REPLACEMENT OF THE PRODUCT. **ArgheZenavis, LLC** and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of **ArgheZenavis, LLC**.

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NOTIFICATION

103050-9

The applicant has certified that no information has been reported to the EPA that this product was used in a manner inconsistent with the labeling. The Agency acknowledges this notification by letter dated:

09/25/2024