APPENDIX 1-2. Commitment Letter from the Atrazine Registrants

The Agency has received commitment letters from the technical registrants for atrazine: Adama; Drexel Chemical Company; Sipcam Agro USA, Inc. (on behalf of Sipcam Oxon S.p.A.), and; Syngenta. The technical registration identified and proposed voluntary label modifications that would reduce the scope and complexity of the biological evaluation for atrazine. Attached to this appendix are the technical registrants’ commitment letters.
May 6, 2020

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Ms. Linsey Walsh, Chemical Review Manager
Pesticide Re-evaluation Division, RMIB III

Subject: Proposed Atrazine Voluntary Label Modifications

Dear Ms. Walsh,

As confirmed in the Atrazine Proposed Interim Registration Review Decision, ADAMA understands that EPA is conducting a nationwide assessment of the potential risks that use of atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA’s Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual atrazine use locations and species locations. ADAMA further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA’s biological evaluation and any subsequent consultations, ADAMA reviewed its atrazine product registrations and labels and the relevant data regarding species locations and potential atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific atrazine uses in specific areas. Based on that review, ADAMA has identified the following voluntary label modifications that would significantly reduce the scope and complexity of EPA’s atrazine use locations analysis, the number of species whose range might overlap with atrazine use sites, and the scope and complexity of EPA’s atrazine biological evaluation and any subsequent consultations. ADAMA has identified these label modifications for these reasons only, and not because of any consideration or determination whether the identified uses actually pose any ecological risks, whether to listed species or otherwise. ADAMA has conferred with the other atrazine technical registrants and understands that they will likewise request and accept the label modifications identified below, and will confirm their commitment to do so in separate letters.

Along with the other atrazine technical registrants, ADAMA will voluntarily request and accept the following label modifications for all atrazine registrations:
• Voluntarily label-off all uses of atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as atrazine is not registered for use in Alaska.

• Voluntarily remove “Roadside” uses from all labels.

• Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.

• Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.

• Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other atrazine technical registrants, ADAMA is also proposing and will accept the following label modifications for all atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):¹

• Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average windspeeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.

• Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - From the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - From threatened and endangered species critical habitat and/or species locations. Bulletins Live (https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

These label modifications would apply to all current ADAMA atrazine product registrations as listed in Appendix 1 to this letter, as well as any future atrazine product registrations. ADAMA and the other atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency’s ongoing atrazine endangered species risk assessment. If you have any questions on these label modifications or related matters we are willing and available to discuss them.

Kind Regards,

Jacob S. Moore
Federal Regulatory Manager
### Appendix 1: Current ADAMA Atrazine Product Registrations

<table>
<thead>
<tr>
<th>Primary Product Name</th>
<th>Registration Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atrazine Technical</td>
<td>11603-38</td>
</tr>
<tr>
<td>Atrazine 4L</td>
<td>66222-36</td>
</tr>
<tr>
<td>Atrazine 90DF</td>
<td>66222-37</td>
</tr>
<tr>
<td>Triangle Herbicide</td>
<td>66222-131</td>
</tr>
<tr>
<td>Parallel Plus</td>
<td>66222-132</td>
</tr>
<tr>
<td>MANA Atrazine 90DF</td>
<td>66222-229</td>
</tr>
<tr>
<td>ADA 68702</td>
<td>66222-280</td>
</tr>
<tr>
<td>ADA 68703</td>
<td>66222-281</td>
</tr>
</tbody>
</table>
May 5, 2020

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

ATTENTION: Ms. Linsey Walsh, Chemical Review Manager
Pesticide Re-evaluation Division, RMIB III

Re: Proposed Atrazine Voluntary Label Modifications

Dear Ms. Walsh,

As confirmed in the Atrazine Proposed Interim Registration Review Decision, Drexel understands that EPA is conducting a nationwide assessment of the potential risks that use of Atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA’s Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual Atrazine use locations and species locations. Drexel further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA’s biological evaluation and any subsequent consultations, Drexel reviewed its Atrazine product registrations and labels and the relevant data regarding species locations and potential Atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific Atrazine uses in specific areas. Based on that review, Drexel has identified the following voluntary label modifications that would significantly reduce the scope and complexity of EPA’s Atrazine use locations analysis, the number of species whose range might overlap with Atrazine use sites, and the scope and complexity of EPA’s Atrazine biological evaluation and any subsequent consultations. Drexel has identified these label modifications for these reasons only, and not because of any consideration or determination whether the identified uses actually pose any ecological risks, whether to listed species or otherwise. Drexel has conferred with the other Atrazine technical registrants and understands that they will likewise request and accept the label modifications identified below, and will confirm their commitment to do so in separate letters.
Along with the other Atrazine technical registrants, Drexel will voluntarily request and accept the following label modifications for all Atrazine registrations:

- Voluntarily label-off all uses of Atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as Atrazine is not registered for use in Alaska.
- Voluntarily remove “Roadside” uses from all labels.
- Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.
- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.
- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other Atrazine technical registrants, Drexel is also proposing and will accept the following label modifications for all Atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):¹

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average wind speeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.
- Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - from the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - from threatened and endangered species critical habitat and/or species locations. Bulletins Live (https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

These label modifications would apply to all current Drexel Atrazine product registrations as listed in APPENDIX 1 to this letter, as well as any future Atrazine product registrations. Drexel and the other Atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency’s ongoing Atrazine endangered species risk assessment.

If you have any questions on these label modifications or related matters, we are willing and available to discuss them. Thank you.

Respectfully yours,

For Drexel Chemical Company

Scott Pace
Director of Registration

# APPENDIX 1: ATRAZINE PRODUCTS CURRENTLY REGISTERED BY DREXEL

<table>
<thead>
<tr>
<th>EPA REG #</th>
<th>BRAND NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>19713-11</td>
<td>Drexel Atrazine 4L</td>
</tr>
<tr>
<td>19713-76</td>
<td>Drexel Atrazine 90 DF</td>
</tr>
<tr>
<td>19713-80</td>
<td>Atra-5</td>
</tr>
<tr>
<td>19713-171</td>
<td>Drexel Simazat 4L Herbicide</td>
</tr>
<tr>
<td>19713-291</td>
<td>Drexel Atrazine 5L Herbicide</td>
</tr>
<tr>
<td>19713-498</td>
<td>Drexel Atrazine 4F</td>
</tr>
<tr>
<td>19713-499</td>
<td>Drexel Atrazine 90DP</td>
</tr>
<tr>
<td>19713-513</td>
<td>Drexel Acetochlor Plus Atrazine</td>
</tr>
<tr>
<td>19713-547</td>
<td>Drexel Trizmet II</td>
</tr>
<tr>
<td>19713-553</td>
<td>Drexel Simazat 90DF</td>
</tr>
<tr>
<td>19713-565</td>
<td>Atrazine Technical 2</td>
</tr>
<tr>
<td>19713-566</td>
<td>Drexel Atrazine Technical</td>
</tr>
<tr>
<td>19713-567</td>
<td>Drexel Auguzine</td>
</tr>
<tr>
<td>19713-663</td>
<td>Drexel Trizmet Lite</td>
</tr>
<tr>
<td>19713-686</td>
<td>Drexel Trizar Herbicide</td>
</tr>
<tr>
<td>19713-688</td>
<td>Drexel TrizMax Herbicide</td>
</tr>
</tbody>
</table>
April 29, 2020

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Ms. Linsey Walsh, Chemical Review Manager
Pesticide Re-evaluation Division, RMIB III

Subject: Proposed Atrazine Voluntary Label Modifications

Dear Ms. Walsh,

On behalf of Sipcam Oxon S.p.A., Sipcam Agro USA, Inc. offers the following proposal. As confirmed in the Atrazine Proposed Interim Registration Review Decision, Sipcam Oxon S.p.A. (Sipcam Oxon) understands that EPA is conducting a nationwide assessment of the potential risks that use of atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA’s Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual atrazine use locations and species locations. Sipcam Oxon further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA’s biological evaluation and any subsequent consultations, Sipcam Oxon reviewed its atrazine product registrations and labels and the relevant data regarding species locations and potential atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific atrazine uses in specific areas. Based on that review, Sipcam Oxon agrees to the following voluntary label modifications that would significantly reduce the scope and complexity of EPA’s atrazine use locations analysis, the number of species whose range might overlap with atrazine use sites, and the scope and complexity of EPA’s atrazine biological evaluation and any subsequent consultations. Sipcam Oxon agrees these label modifications for these reasons only, and not because of any consideration or determination whether the agreed upon uses actually pose any ecological risks, whether to listed species or otherwise. Sipcam Oxon has conferred with the other atrazine technical registrants and understands that they will likewise request and accept the label modifications listed below, and will confirm their commitment to do so in separate letters.
Along with the other atrazine technical registrants, Sipcam Oxon will voluntarily request and accept the following label modifications for all atrazine registrations:

- Voluntarily label-off all uses of atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as atrazine is not registered for use in Alaska.
- Voluntarily remove “Roadside” uses from all labels.
- Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.
- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.
- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other atrazine technical registrants, Sipcam Oxon is also proposing and will accept the following label modifications for all atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):¹

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average windspeeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.
- Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - from the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - from threatened and endangered species critical habitat and/or species locations. Bulletins Live (https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

Ms. Linsey Walsh  
April 29, 2020  
Proposed Atrazine Voluntary Label Modifications

These label modifications would apply to all current Sipcam Oxon atrazine product registrations as listed in Appendix 1 to this letter, as well as any future atrazine product registrations. Sipcam Oxon and the other atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency’s ongoing atrazine endangered species risk assessment. If you have any questions on these label modifications or related matters we are willing and available to discuss them.

Sincerely,

Lizbeth Rea  
Director of Regulatory Affairs  
Sipcam Agro USA, Inc.  
US Agent for Sipcam Oxon Italia S.p.A.
Appendix 1: Current Sipcam Oxon S.p.A. Atrazine Product Registrations

<table>
<thead>
<tr>
<th>Primary Product Name</th>
<th>Registration Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxon Italia Atrazine Technical II</td>
<td>35915-14</td>
</tr>
<tr>
<td>Atrazine 4L Herbicide</td>
<td>35915-4</td>
</tr>
<tr>
<td>Atrazine 90 Herbicide</td>
<td>35915-3</td>
</tr>
</tbody>
</table>
April 17, 2020

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention:  Ms. Linsey Walsh, Chemical Review Manager
Pesticide Re-evaluation Division, RMIB III

Subject:  Proposed Atrazine Voluntary Label Modifications

Dear Ms. Walsh,

As confirmed in the Atrazine Proposed Interim Registration Review Decision, Syngenta understands that EPA is conducting a nationwide assessment of the potential risks that use of atrazine may pose to federally listed threatened or endangered species or designated critical habitat, in support of the effects determination under Endangered Species Act § 7(a)(2) that EPA is scheduled to complete by August 2021. According to EPA’s Draft Proposed Revised Method for National Level Endangered Species Risk Assessment Process for Biological Evaluations of Pesticides, the foundation of that assessment is an analysis of the potential overlap between approved or actual atrazine use locations and species locations. Syngenta further understands that, depending on the results of its effects determinations, EPA may determine that formal or informal consultation with the Services under § 7(a)(2) may be necessary.

In the interest of streamlining and improving the process for EPA’s biological evaluation and any subsequent consultations, Syngenta reviewed its atrazine product registrations and labels and the relevant data regarding species locations and potential atrazine use locations, as well as information regarding the current actual scope of use and the agronomic or other needs for specific atrazine uses in specific areas. Based on that review, Syngenta has identified the following voluntary label modifications that would significantly reduce the scope and complexity of EPA’s atrazine use locations analysis, the number of species whose range might overlap with atrazine use sites, and the scope and complexity of EPA’s atrazine biological evaluation and any subsequent consultations. Syngenta has identified these label modifications for these reasons only, and not because of any consideration or determination whether the identified uses actually pose any ecological risks, whether to listed species or otherwise. Syngenta has conferred with the other atrazine technical registrants and understands that they will likewise request and accept the label modifications identified below, and will confirm their commitment to do so in separate letters.
Along with the other atrazine technical registrants, Syngenta will voluntarily request and accept the following label modifications for all atrazine registrations:

- Voluntarily label-off all uses of atrazine in Hawaii and the U.S. territories (Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, and the North Mariana Islands), thereby restricting registered uses to the contiguous United States as atrazine is not registered for use in Alaska.

- Voluntarily remove “Roadside” uses from all labels.

- Voluntarily remove “Conservation Reserve Program (CRP)” uses from all labels.

- Voluntarily remove “Conifer” uses from all labels, including Christmas trees, timber and all forestry uses.

- Restrict “Fallow” uses on all labels to the following scenarios and geographies only:
  - Wheat-Corn-Fallow in CO, KS, ND, NE, SD & WY
  - Wheat-Fallow-Wheat in CO, KS, ND, NE, SD & WY
  - Wheat-Sorghum-Fallow in AR, CO, GA, IL, KS, LA, MS, MO, NE, NM, NC, OK, SD & TX

Along with the other atrazine technical registrants, Syngenta is also proposing and will accept the following label modifications for all atrazine registrations to provide assurance against potential risks to listed species according to the best available science as demonstrated in MRID 50683101 (Brain et al., 2019):¹

- Require the following mandatory spray drift language: Use nozzles intended to deliver a coarse to ultra-coarse droplet size distribution. Do not apply if average windspeeds exceed 10 mph (16 kph) for ground applications or 15 mph (24 kph) for aerial applications. Use a maximum release height of 4 feet (1.2 meters) for ground applications and 10 feet (3 meters) for aerial applications.

- Require an in-field downwind buffer of 15 feet (4.6 meters) for ground applications and 150 feet (46 meters) for aerial applications:
  - from the edge of all streams and rivers as well as the high-tide line for all estuarine/marine environments, and
  - from threatened and endangered species critical habitat and/or species locations. Bulletins Live (https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins) can be utilized to identify counties with potential co-occurrence of listed species and registered uses.

---

These label modifications would apply to all current Syngenta atrazine product registrations as listed in Appendix 1 to this letter, as well as any future atrazine product registrations. Syngenta and the other atrazine technical registrants are offering these voluntary label modifications in the hope that they will streamline and improve the Agency’s ongoing atrazine endangered species risk assessment. If you have any questions on these label modifications or related matters we are willing and available to discuss them.

Kind Regards,

Cherilyn Moore
Regulatory Product Manager
Appendix 1: Current Syngenta Atrazine Product Registrations

<table>
<thead>
<tr>
<th>Primary Product Name</th>
<th>Registration Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAtrex 4L Herbicide</td>
<td>100-497</td>
</tr>
<tr>
<td>AAtrex Nine-O Herbicide</td>
<td>100-585</td>
</tr>
<tr>
<td>Acuron Herbicide</td>
<td>100-1466</td>
</tr>
<tr>
<td>Atrazine 4L MUP</td>
<td>100-1650</td>
</tr>
<tr>
<td>Atrazine Base Mix Manufacturing Use Product</td>
<td>100-1235</td>
</tr>
<tr>
<td>Atrazine Nine-O MUP</td>
<td>100-1659</td>
</tr>
<tr>
<td>Atrazine Technical</td>
<td>100-1207</td>
</tr>
<tr>
<td>Atrazine Wet Paste Manufacturing Use Product</td>
<td>100-1236</td>
</tr>
<tr>
<td>Bicep II Magnum Herbicide</td>
<td>100-817</td>
</tr>
<tr>
<td>Bicep II Magnum Manufacturing Use Product</td>
<td>100-1214</td>
</tr>
<tr>
<td>Bicep Lite II Magnum Herbicide</td>
<td>100-827</td>
</tr>
<tr>
<td>Bicep Lite II Magnum Manufacturing Use Product</td>
<td>100-1213</td>
</tr>
<tr>
<td>Bicep Magnum</td>
<td>100-886</td>
</tr>
<tr>
<td>Callisto Xtra Herbicide</td>
<td>100-1359</td>
</tr>
<tr>
<td>Expert Herbicide</td>
<td>100-1161</td>
</tr>
<tr>
<td>Lexar EZ Herbicide</td>
<td>100-1414</td>
</tr>
<tr>
<td>Lumax EZ Herbicide</td>
<td>100-1442</td>
</tr>
<tr>
<td>SYN-A17227 Herbicide</td>
<td>100-1356</td>
</tr>
</tbody>
</table>