Registration No 83558-28 Volume 1

DATA PACKAGE BEAN SHEET

Date: 19-Apr-2005

* * * Registration Information * * *

Registration: 72167-LN - TRICLOPYR TEA MC

Company: 72167 - NATIONS AG II, LLC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# CM-2 241

Risk Manager Reviewer: Tobi Colvin-Snyder TSNYDER

Sent Date: Calculated Due Date: Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R31.1) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIS

Ingredients: 116001, Triclopyr(44.4%)

* * * Data Package Information * * *

Expedite: ○ Yes ● No Date Sent: 19-Apr-2005 Due Back:

DP Ingredient: 116001, Triclopyr

DP Title: Acute Toxicology Similarity Determination

CSF Included: ● Yes ○ No Label Included: ● Yes ○ No Parent DP #:

	Assigned To	Date In	Date Out		
Organization:	RD / TRB			Administrative Due Date:	15-Dec-2005
Team Name:				Negotiated Due Date:	
Reviewer Name:				Projected Completion Date:	
Contractor Name:					

* * * Studies Sent for Review * * *

No Studies

* * * Additional Data Package for this Decision * * *

Printed on Page 2

* * * Data Package Instructions * * *

See bean sheet for identical product 72167-UO (DP bar code 315937).

Thanks.

Tobi

DP #: (316012)

Decision #: 354073

DATA PACKAGE BEAN SHEET

Date: 19-Apr-2005

* * * Registration Information * * *

Registration: 72167-LN - TRICLOPYR TEA MC

Company: 72167 - NATIONS AG II, LLC

Risk Manager: RM 25 - James Tompkins - (703) 305-5697 Room# CM-2 241

Risk Manager Reviewer: Tobi Colvin-Snyder TSNYDER

Sent Date: Calculated Due Date: Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (R31.1) NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMIS

Ingredients: 116001, Triclopyr(44.4%)

* * * Data Package Information * * *

Expedite: ○ Yes ● No Date Sent: 19-Apr-2005 Due Back:

DP Ingredient: 116001, Triclopyr

DP Title: Product Chemistry Data

CSF Included: ● Yes ○ No Label Included: ● Yes ○ No Parent DP #:

	Assigned To	Date In	Date Out		
Organization:	RD / TRB			Administrative Due Date:	15-Dec-2005
Team Name:				Negotiated Due Date:	
Reviewer Name:				Projected Completion Date:	
Contractor Name:					

* * * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

See bean sheet for identical product 72167-UO (DP barcode 315935).

Thanks.

Tobi

DP#: (316012) * * * Studies Sent for Review * * * Decision#: (354073)

MRID	Citation Reference	Guideline
46476801	Rhodes, M. (2005) Triclopyr TEA MC: Product Chemistry Group A. Project Number: MER0401. Unpublished study prepared by Nations AG II, LLC. 38 p.	830.1550/Product Identity and co
46476801	Rhodes, M. (2005) Triclopyr TEA MC: Product Chemistry Group A. Project Number: MER0401. Unpublished study prepared by Nations AG II, LLC. 38 p.	830.1600/Description of materials
46476801	Rhodes, M. (2005) Triclopyr TEA MC: Product Chemistry Group A. Project Number: MER0401. Unpublished study prepared by Nations AG II, LLC. 38 p.	830.1650/Description of formulati
46476801	Rhodes, M. (2005) Triclopyr TEA MC: Product Chemistry Group A. Project Number: MER0401. Unpublished study prepared by Nations AG II, LLC. 38 p.	830.1670/Discussion of formation
46476802	Weller, P. (2004) End-Use Product Chemistry of a 44.4% Triclopyr Triethylamine Salts. Project Number: 305550/1/049. Unpublished study prepared by Midwest Research Institute. 38 p.	830.1700/Preliminary analysis
46476802	Weller, P. (2004) End-Use Product Chemistry of a 44.4% Triclopyr Triethylamine Salts. Project Number: 305550/1/049. Unpublished study prepared by Midwest Research Institute. 38 p.	830.1750/Certified limits
46476802	Weller, P. (2004) End-Use Product Chemistry of a 44.4% Triclopyr Triethylamine Salts. Project Number: 305550/1/049. Unpublished study prepared by Midwest Research Institute. 38 p.	830.1800/Enforcement analytical

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
72167-50	NOV 4 2005

NOTICE OF PESTICIDE:
_x_ Registration
____ Reregistration

(under FIFRA, as amended)

Term of Issuance: Conditional

Name of Pesticide Product: Triclopyr TEA MC

Name and Address of Registrant (include ZIP Code):

Nations AG II, LLC
4680 Monticello Avenue, 18i-174
Williamsburg, VA 23188

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.

2. Make the following changes to your labeling:

a. Change the registration number to "72167-50"

b. In the precautionary statements, immediately after "Do not get in eyes or on clothing" add "Wear protective eyewear (goggles, face shield, or safety glasses)." Immediately after "Wash thoroughly with soap and water after handling" add "and before eating, drinking or using tobacco." At the end of the paragraph, add "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."

c. In the directions for use, change "Only For Formulation..." to "For Formulation..." (delete "Only"). The statement as written conflicts with the paragraph above it.

Signature of Approving Official:	Date:
Joanne S. Miller for James Tompkins	NOV 4 2005

EPA Form 8570-6

d. In the "Terms of Sale" and "Limitations of Liability" sections, add "To the extent permitted by law" immediately prior to "All such risks...", "The exclusive remedy...", and "Under no circumstances..."

3. Submit final labeling for this product **within 30 days** of the date of this letter.

4. Submit storage stability (Guideline 830.6317) and corrosion characteristics (Guideline 830.6320) studies to the Agency upon completion.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. The basic confidential statement of formula (csf) for this product dated August 29, 2005 is acceptable and has been placed in our files.

If you have any questions about this letter, please contact Tobi Colvin-Snyder at 703-305-7801.

Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

TRICLOPYR TEA MC

For Manufacturing Use Only

ACTIVE INGREDIENT:	
***Triclopyr: (3, 5, 6-trichloro-2-pyridinyl)Oxyacetic acid, triethylamine salt.....**	**44.4%**
INERT INGREDIENTS.....	**55.6%**
Total.....	**100.0%**

Contains 3 pounds of triclopyr acid equivalent per gallon (31.8%)

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx LN
EPA Est. No: xxxx

Net Contents: XXXX

Nations Ag II, LLC
2901-12 Rivendell
Knoxville, TN 37922

ACCEPTED
with COMMENTS
In EPA Letter Dated
NOV 4 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 72167-50

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 or clothing	• 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 swallowed	• 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 the 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. In case of a Medical Emergency involving this product, call **1-800-308-5391**.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin, eyes, or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing 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 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 be used to formulate products for specific use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

Only For Formulation into a Herbicide for the Following Use(s):

Aquatic Food Crop and Nonfood:

Non-irrigation canals
Ditches, Non-irrigation ditch banks
Lakes, ponds, reservoirs
Rice
Rights-of-Way
Wildlife habitat areas
Marshes and Wetland Sites

Forestry

Terrestrial Food and Non-Food:

Christmas tree plantations
Industrial areas
Rangeland and pastures
Rights-of-Way, fence rows
Sites associated with wetlands
Turf

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store above 28°F or agitate before use.

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

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

LIMITED WARRANTY, TERMS OF SALE, AND LIMITATION OF LIABILITY

Upon purchase or use of this product, purchaser and user agree to the following terms:

Warranty: Nations Ag II, LLC, (the Company) warrants that this product conforms to the chemical description on the label in all material respects and is reasonably fit for the purpose referred to in the directions for use, subject to the exceptions noted below, which are beyond the Company's control. The Company makes no other representation or warranty, express or implied, concerning the product, including no implied warranty of merchantability or fitness for a particular purpose. No such warranty shall be implied by law, and no agent or representative is authorized to make any such warranty on the Company's behalf.

Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user.

Limitation of Liability: The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damages, and in no event shall damages or any other recovery of any kind exceed the price of the product which caused the alleged loss, damage, injury or other claim. Under no circumstances shall the Company be liable for any special, indirect, incidental or consequential damages of any kind, including loss of profits or income, and any such claims are hereby waived. Some states do not allow the exclusion or limitation of incidental or consequential damages.

The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

Nations Ag II, L.L.C
2901-12 Rivendell
Knoxville, TN 37922

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

TECHNICAL REVIEW BRANCH
SIMILARITY CLINIC DETERMINATION

03/MAY/2005

MEMORANDUM

Subject:	Name of Pesticide Product:	Triclopyr Tea MC
	EPA Reg. No. /File Symbol:	72167-LN
	DP Barcode:	D316013
	Decision No:	354073
	PC Code:	116001
From:	Eugenia McAndrew, Biologist Em Technical Review Branch Registration Division (7505C)	
To:	Tobi Colvin-Snyder, RM Team 25 Herbicide Branch Registration Division (7505C)	
Applicant:	Nations AG II 4680 Monticello Avenue, 18i-174 Williamsburg, VA 23188	

FORMULATION FROM LABEL:

	Active Ingredient(s):	% by wt.
116001	Triclopyr: (3,5,6-trichloro-2-pyridinyl) Oxyacetic acid, triethylamine salt	44.4
	Inert Ingredient(s):	55.6
	Total:	100.00%

ACTION REQUESTED/BACKGROUND: Nations AG II has applied for registration of Triclopyr Tea MC, EPA File Symbol 72167-LN, claiming similarity to Garlon 3A Herbicide, EPA Reg. No. 62719-37, which is a 100% repack of Triclopyr TEA Salt Solution, EPA Reg. No. 62719-53. All three products have a label claim of 44.4% triclopyr. The acute toxicity data submitted for the cited products (MRID 414433-01, -03 to -06 and 43952401) were reviewed in a previous Product Reregistration Branch memo (Piansay; D258786; EPA Reg. No. 62719-53; 30/AUG/1999).

RECOMMENDATIONS: We have evaluated the formulations of the proposed product, 72167-LN, and the cited products, 62719-37 and 62719-53, and have determined that they are substantially similar. The acute toxicity data referenced above may be used to support registration of the new product.

The acute toxicity profile for Triclopyr Tea MC, EPA File Symbol 72167-LN, is as follows:

acute oral toxicity	III	Cited	MRID 41443301
acute dermal toxicity	III	Cited	MRID 43952401
acute inhalation toxicity	IV	Cited	MRID 41443303
primary eye irritation	I	Cited	MRID 41443304
primary skin irritation	IV	Cited	MRID 41443305
dermal sensitization	Positive	Cited	MRID 41443306

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System.

PRODUCT ID #: 072167-00050

PRODUCT NAME: Triclopyr Tea MC

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

SIGNAL WORD: DANGER

SPANISH SIGNAL WORD: 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.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Harmful if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

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.
-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 swallowed:
-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 by a poison control center or doctor.
-Do not give anything to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Note to RM/Registrant: The proposed label should contain a Note to Physician which addresses the category I Primary Eye Irritant toxicity. The following statements are suggested types of information that may be included, if applicable:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

FEE

DATE OUT: 01/SEP/2005

SUBJECT: FEE: PRODUCT CHEMISTRY REVIEW OF MP [X] EP [ ]
DP BARCODE No.: 316012 **File Symbol No.:** 72167-LN
PRODUCT NAME: Triclopyr TEA MC
COMPANY: Nations AG II, LLC
FOOD USE [X] INTEGRATED FORMULATION [X]
PCC: 116001 **Decision No.:** 354073

FROM: Debra Rate
Product Chemistry Team
Technical Review Branch/RD (7505C)

SBan 9/7/05
Debra N. Rate 09/07/05

TO: James Tompkins / Tobi Colvin-Snyder RM 25
Herbicide Branch / RD (7505C)

INTRODUCTION:
The registrant has submitted for review a basic formulation CSF (dated 17/AUG/2005). The proposed manufacturing-use product, Triclopyr TEA MC, has triclopyr acid, triethylamine salt (44.4%) as its active ingredient (AI). The registrant has submitted studies (MRID No. 464768-01 and 464768-02) in support of the proposed manufacturing-use product. The registrant is claiming substantial similarity to EPA Reg. No. 62719-53. The Technical Review Branch (TRB) has been asked to evaluate the submitted CSF and data, and the similarity claim to determine if they support the proposed product's registration.

SUMMARY OF FINDINGS

1. The proposed manufacturing-use product, Triclopyr TEA MC, uses triclopyr acid, triethylamine salt (pending EPA registration) as its active ingredient (AI) with a product label claim of 44.4%.

2. The registrant has submitted a CSF for basic formulation (dated 17/AUG/2005) for the manufacturing-use product, Triclopyr TEA MC. The basic CSF is filled out correctly and completely. The nominal concentration of the AI concurs with the product label claim nominal concentration. The CSF is in compliance with PR Notice 91-2. All of the inert ingredients have been cleared for use by the Agency. The data submitted corresponding to guideline 830.1550 (product identity and composition) and guideline 830.1750 (certified limits) satisfy the requirements of 40§CFR158.155 and 158.175, respectively. [MRID No. 464768-01]

3. The data submitted corresponding to the guideline reference 830.1600 (description of materials used to produce the product) satisfies the data requirements of 40§CFR158.160. [MRID No. 464768-01]

4. The data submitted corresponding to guideline reference 830.1650 (description of formulation process) satisfies the data requirements of 40CFR§158.165. [MRID No. 464768-01]

5. The data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfies the data requirements of 40§CFR158.167. No impurities are reported introduced by the formulation of the product or from packaging materials. No impurities of toxic concern were reported by the registrant. [MRID No. 464768-01]

6. The data submitted corresponding to guideline reference 830.1800 (enforcement analytical method) satisfies the data requirements of 40CFR§158.180. The method submitted to determine the %AI, triclopyr triethylamine salt, uses high performance liquid chromatography (HPLC) and UV detection (280 nm). [MRID No. 464768-02]

BARCODE No.: 316012 **File Symbol No.:** 72167-LN **PRODUCT NAME:** Triclopyr TEA MC

7. The registrant is claiming substantial similarity to EPA Reg. 62719-53. TRB has evaluated this claim and has identified the following findings:

(a) The active ingredient is the same with the same % nominal concentration and label claim.

(b) The densities of the two products are similar, differing only by 0.4 lbs / gal. .

(c) The pHs of the two products, although both basic, differ by 1.5 orders of magnitude. However, the method's used to determine the pH would account for at least part of this difference.

(d) The both the cited product and the subject product are combustible.

8. The data submitted corresponding to 830 Series Subgroup B (physical-chemical properties) satisfy the data requirements of 40CFR§158.190, except for guideline 830.6317 (storage stability) and 830.6320 (corrosion characteristics) [MRID No. 464719-01]

9. The ingredient and storage / disposal statement on the proposed label meet label requirements from a product chemistry point of view.

CONCLUSIONS:

TRB has reviewed the submitted basic formulation CSF (dated 17/AUG/2005) and product chemistry data for the proposed manufacturing-use product, Triclopyr Tea MC, and has concluded:

1. The product chemistry data submitted corresponding to 830 Series Subgroup A are acceptable.

2. The CSF for basic formulation (dated 17/AUG/2005) is acceptable pending the registration of the technical source.

3. TRB has evaluated the physical characteristics of the subject product and the "similar" product (EPA Reg. No. 62719-53) and has concluded that from a product chemistry point of view, the two end-use products are similar.

4. The product chemistry data submitted corresponding to 830 Series Subgroup B are acceptable, except for guideline 830.6317 (Storage Stability) and 830.6320 (Corrosion Characteristics). These studies must be submitted to the Agency on completion.

BARCODE No.: 316012 **File Symbol No.:** 72167-LN **PRODUCT NAME:** Triclopyr TEA MC

PRODUCT CHEMISTRY DATA (SERIES 830 Subgroup A & Subgroup B)

Subgroup A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (Basic CSF)	Y	CSF (dated 17/AUG/2005) 464768-01
830.1600. Beginning Materials	Y	464768-01
830.1650. Formulation Process	Y	464768-01
830.1670. Discussion of Impurities	Y	464768-01
830.1700. Preliminary Analysis	NA	
830.1750. Certified Limits (Basic CSF)	Y	CSF (dated 17/AUG/2005) 464768-01
830.1800. Enforcement Analytical Method	Y	464768-02

Subgroup B	Data Required Fulfilled	Value or Qualitat. Descrip.	MRID No.
830.6302. Color	Y	Pale Yellow	461114-02
830.6303. Physical State	Y	Clear Liquid	461114-02
830.6304. Odor	Y	Mild Odor	461114-02
830.6314. Oxidation/Reduction Action	Y	Subject product is compatible with water, kerosene, zinc powder, monoammonium phosphate. Subject product is oxidized in the presence of oxidizing agents (potassium permanganate.)	461114-02
830.6315. Flammability	Y	110 °F (43 °C)	461114-02
830.6316. Explodability	NA	Product not composed of explosive materials.	461114-02
830.6317. Storage stability	N		
830.6319. Miscibility	NA	Not intended to be mixed with petroleum products.	
830.6320. Corrosion Characteristics	N		
830.6321. Dielec. Bkd. Vltg.	NA	Not intended to be used around electrical equipment.	
830.7000. pH	Y	pH = 8.10 (1% in aqueous)	461114-02
830.7100. Viscosity	Y	15.50 cP at 20°C	461114-02
830.7300. Density/Bulk Density	Y	1.14 g/ml at 20°C	461114-02

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable; G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.

BARCODE No.: 316012 **File Symbol No.:** 72167-LN **PRODUCT NAME:** Triclopyr TEA MC

830.1800 Enforcement Analytical Method: [MRID No. 464768-02]

The %AI, Triclopyr acid, triethylamine salt, was determined by HPLC / UV (280 nm).

Reagents:
Methanol, HPLC grade
Analytical standard, triclopyr, 100% purity
Benzoic acid, 99.5% purity
Trifluoroacetic acid (TFA), HPLC grade
Water, purified
Test substance

Equipment:

HPLC	Agilent 1100 Series with autosampler, quaternary pump, degasser, variable wavelength detector, agilent solvent cabinet, column heater, and data system.
Column:	Zorbax Eclipse XDB C18, 5 µm, 250 X 4.6 mm I.D.
Analytical balance:	Mettler Toledo AG245
Sonicator:	Branson 5200
Filters:	Acrodisc, CR, 25-mm syringe filter, 0.45 µm PTFE membrane
Volumetric Glassware	
Autosampler Vials:	amber glass

Operating Conditions:

Mobile Phase A:	1 ml trifluoroacetic acid to 1 L of water (0.1% acid by volume)
Mobile Phase B:	1 ml trifluoroacetic acid to 1 L of methanol (0.1% acid by volume)
Column Temperature:	30 °C
Integration:	TurboChrom Data System Version 6.1.1.0.0:K20; Interface, PE Nelson 970A
Column:	Zorbax Eclipse XDB C18, 5 µm, 250 X 4.6 mm I.D.
Program:	65% Mobile Phase B for 20 min (Isocratic)
Flow Rate:	1.0 ml / min.
Injection Volume:	20 µl
Retention Times:	
Benzoic Acid:	~4.0 min.
Triclopyr Triethylamine salt:	~9.8 min.

CHEMICAL NAME/PESTICIDE CHEMICAL CODE (PCC) REQUEST FORM

CR#: 057033

REQUESTOR NAME: DEBRA RATE REQUEST DATE: 08/05/05
TEL.: (703) 306-0309 ORG.: RD/TRB ROOM: ____ MAIL CODE: 7505C
(DIV./BR..)

CSF ATTACHED:

☑ YES If CSF is attached complete Item A and the chemical name in Item B
☐ NO If CSF is not attached complete Items A through C.

A. INFORMATION REQUIRED:

✓Check Applicable Category

☑ Provide PCC and Tolerance Exemption Status For Food-Use Inert Ingredient(s)
☐ Provide PCC for Non-Food Use Inert Ingredient(s)
☐ Provide PCC for Active Ingredient(s)
☐ Provide PCC for Dye
☐ Determine if Fragrance is Acceptable for Use in Formulation
☐ Other (Describe): ____

B. INGREDIENT INFORMATION:

Inert ingredient information may be entitled to confidential treatment

Ingredient No. 1:

Chem. Name: [redacted]
Trade Name: ____
CAS Reg. No.: [redacted]

Ingredient No. 2:

Chem. Name: ____
Trade Name: ____
CAS Reg. No.: ____

Ingredient No. 3:

Chem. Name: ____
Trade Name: ____
CAS Reg. No.: ____

Ingredient No. 4:

Chem. Name: ____
Trade Name: ____
CAS Reg. No.: ____

C. PESTICIDE PRODUCT INFORMATION:

EPA Reg. No./File Symbol: 72167-LN Product Name: Triclopyr TEA MC
Registrant: Nations AG II Food-Use Pesticide: ☑ YES ☐ NO
Precent in Formulation (For Fragrance/Dyes only): — %

INFORMATION REPORTED:

Ingredient No. 1:
PCC: [redacted]
TOL. STATUS:
OTHER INF.: ____

Ingredient No. 2:
PCC: ____
TOL. STATUS ____
OTHER INF.: ____

Ingredient No. 3:
PCC: ____
TOL. STATUS : ____
OTHER INF.: ____

Ingredient No. 4:
PCC:
TOL. STATUS
OTHER INF.:

Completed By: LINDA FAN Date Completed : 08/05/05

Once completed, this form may be entitled to treatment as CBI under section 10 of FIFRA. If so, a red FIFRA CBI cover should be affixed to the request form and the document handled accordingly.

August 29, 2005

Dr. Debra Rate
Registration Division (H7505C)
Office of Pesticide Programs
Document Processing Desk (APPL)
US Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 South Bell Street
Arlington, VA 22202

Re: TRICLOPYR TEA MC
EPA File Symbol 72167-LN
Revised Confidential Statement of Formula

Dear Dr. Rate:

Per your E-mail of August 25, 2005, Nations Ag II, LLC., herewith submits the enclosed revised Confidential Statement of Formula (CSF) for TRICLOPYR TEA MC (44.4% active ingredient) as a manufacturing use product.

The enclosed CSF correctly includes the Flash Point of 110°F in Box 9 of the CSF.

Additionally, enclosed draft labeling has been revised to include "Combustible" in the Physical or Chemical Hazards Section.

Please contact Becky Rhodes at 865-982-8379; at BRhodesAgResOpps@aol.com; or at 509 Whites Mill Road; Maryville, TN 37803 if there are any additional questions about this submission.

Sincerely,

Becky Rhodes

Becky Rhodes
Ag Research Opportunities
Representing Nations AG. II, LLC.

Cc: Tobi Colvin-Snyder, PM Team 25

August 29, 2005

Dr. Debra Rate
Registration Division (H7505C)
Office of Pesticide Programs
Document Processing Desk (APPL)
US Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 South Bell Street
Arlington, VA 22202

Re: TRICLOPYR 3 (TEA SALT)
EPA File Symbol 72167-UO
Revised Confidential Statement of Formula

Dear Dr. Rate:

Per your E-mail of August 25, 2005, Nations Ag II, LLC., herewith submits the enclosed revised Confidential Statement of Formula (CSF) for TRICLOPYR 3 (TEA SALT) (44.4% active ingredient) as an end use product.

The enclosed CSF correctly includes the Flash Point of 110°F in Box 9 of the CSF.

The previously submitted labeling for this product (dated 020305) correctly indicates this product is "Combustible" in the **Physical or Chemical Hazards Section**.

Please contact Becky Rhodes at 865-982-8379; at BRhodesAgResOpps@aol.com; or at 509 Whites Mill Road; Maryville, TN 37803 if there are any additional questions about this submission.

Sincerely,

Becky Rhodes

Becky Rhodes
Ag Research Opportunities
Representing Nations AG. II, LLC.

Cc: Tobi Colvin-Snyder, PM Team 25

Inert ingredient information may be entitled to confidential treatment

August 17, 2005

Ms. Debra Rate
Registration Division (H7505C)
Office of Pesticide Programs
Document Processing Desk (APPL)
US Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 South Bell Street
Arlington, VA 22202

Re: TRICLOPYR TEA MC
EPA File Symbol 72167-LN
Revised Confidential Statement of Formula

Dear Ms. Rate:

Per our telephone conversation on August 16, 2005, Nations Ag II, LLC., herewith submits the enclosed revised Confidential Statement of Formula (CSF) for TRICLOPYR TEA MC (44.4% active ingredient) as a manufacturing use product.

The enclosed CSF addresses the following concerns:

- Corrected CAS # and spelling for confidential inerts
- Omission of [redacted]
- Changes in the use of parentheses to [redacted] concentrations
- Change in [redacted]

Please contact Becky Rhodes at 865-982-8379; at BRhodesAgResOpps@aol.com; or at 509 Whites Mill Road; Maryville, TN 37803 if there are any questions about this submission.

Sincerely,

Becky Rhodes

Becky Rhodes
Ag Research Opportunities
Representing Nations AG. II, LLC.

Cc: Tobi Colvin-Snyder, PM Team 25

TRICLOPYR TEA MC

For Manufacturing Use Only

ACTIVE INGREDIENT:	
***Triclopyr: (3, 5, 6-trichloro-2-pyridinyl)Oxyacetic acid, triethylamine salt.....**	**44.4%**
INERT INGREDIENTS.....	**55.6%**
Total.....	**100.0%**

Contains 3 pounds of triclopyr acid equivalent per gallon (31.8%)

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx
EPA Est. No: xxxx

Net Contents: XXXX

Nations Ag II, LLC
2901-12 Rivendell
Knoxville, TN 37922

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 or clothing	• 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 swallowed	• 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 the 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. In case of a Medical Emergency involving this product, call **1-800-308-5391**.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin, eyes, or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing 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 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.

Physical or Chemical Hazards

Combustible. Do not use or store near heat or open flame.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

Only For Formulation into a Herbicide for the Following Use(s):

Aquatic Food Crop and Nonfood:

Non-irrigation canals
Ditches, Non-irrigation ditch banks
Lakes, ponds, reservoirs
Rice
Rights-of-Way
Wildlife habitat areas
Marshes and Wetland Sites

Forestry

Terrestrial Food and Non-Food:

Christmas tree plantations
Industrial areas
Rangeland and pastures
Rights-of-Way, fence rows
Sites associated with wetlands
Turf

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

LIMITED WARRANTY, TERMS OF SALE, AND LIMITATION OF LIABILITY

Upon purchase or use of this product, purchaser and user agree to the following terms:

Warranty: Nations Ag II, LLC, (the Company) warrants that this product conforms to the chemical description on the label in all material respects and is reasonably fit for the purpose referred to in the directions for use, subject to the exceptions noted below, which are beyond the Company's control. The Company makes no other representation or warranty, express or implied, concerning the product, including no implied warranty of merchantability or fitness for a particular purpose. No such warranty shall be implied by law, and no agent or representative is authorized to make any such warranty on the Company's behalf.

Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user.

Limitation of Liability: The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damages, and in no event shall damages or any other recovery of any kind exceed the price of the product which caused the alleged loss, damage, injury or other claim. Under no circumstances shall the Company be liable for any special, indirect, incidental or consequential damages of any kind, including loss of profits or income, and any such claims are hereby waived. Some states do not allow the exclusion or limitation of incidental or consequential damages.

The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

Nations Ag II, L.L.C
2901-12 Rivendell
Knoxville, TN 37922

TRICLOPYR TEA MC

For Manufacturing Use Only

ACTIVE INGREDIENT:	
***Triclopyr: (3, 5, 6-trichloro-2-pyridinyl)Oxyacetic acid, triethylamine salt.....**	**44.4%**
INERT INGREDIENTS.....	**55.6%**
Total.....	**100.0%**

Contains 3 pounds of triclopyr acid equivalent per gallon (31.8%)

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx
EPA Est. No: xxxx

Net Contents: XXXX

Nations Ag II, LLC
2901-12 Rivendell
Knoxville, TN 37922

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 or clothing	• 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 swallowed	• 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 the 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. In case of a Medical Emergency involving this product, call **1-800-308-5391**.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin, eyes, or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing 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 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.

Physical or Chemical Hazards

Combustible. Do not use or store near heat or open flame.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

Only For Formulation into a Herbicide for the Following Use(s):

Aquatic Food Crop and Nonfood:

Non-irrigation canals
Ditches, Non-irrigation ditch banks
Lakes, ponds, reservoirs
Rice
Rights-of-Way
Wildlife habitat areas
Marshes and Wetland Sites

Forestry

Terrestrial Food and Non-Food:

Christmas tree plantations
Industrial areas
Rangeland and pastures
Rights-of-Way, fence rows
Sites associated with wetlands
Turf

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store above 28°F or agitate before use.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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Upon purchase or use of this product, purchaser and user agree to the following terms:

Warranty: Nations Ag II, LLC, (the Company) warrants that this product conforms to the chemical description on the label in all material respects and is reasonably fit for the purpose referred to in the directions for use, subject to the exceptions noted below, which are beyond the Company's control. The Company makes no other representation or warranty, express or implied, concerning the product, including no implied warranty of merchantability or fitness for a particular purpose. No such warranty shall be implied by law, and no agent or representative is authorized to make any such warranty on the Company's behalf.

Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user.

Limitation of Liability: The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damages, and in no event shall damages or any other recovery of any kind exceed the price of the product which caused the alleged loss, damage, injury or other claim. Under no circumstances shall the Company be liable for any special, indirect, incidental or consequential damages of any kind, including loss of profits or income, and any such claims are hereby waived. Some states do not allow the exclusion or limitation of incidental or consequential damages.

The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

Nations Ag II, L.L.C
2901-12 Rivendell
Knoxville, TN 37922

TRICLOPYR TEA MC

For Manufacturing Use Only

ACTIVE INGREDIENT:	
***Triclopyr: (3, 5, 6-trichloro-2-pyridinyl)Oxyacetic acid, triethylamine salt.....**	**44.4%**
INERT INGREDIENTS.....	**55.6%**
Total.....	**100.0%**

Contains 3 pounds of triclopyr acid equivalent per gallon (31.8%)

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx
EPA Est. No: xxxx

Net Contents: XXXX

Nations Ag II, LLC
2901-12 Rivendell
Knoxville, TN 37922

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 or clothing	• 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.
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Wildlife habitat areas
Marshes and Wetland Sites

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Turf

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Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user.

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The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

Nations Ag II, L.L.C
2901-12 Rivendell
Knoxville, TN 37922

Fee for Service

This package includes the following	for Division
☒ New Registration	☒ RD
☐ Amendment	☐ AD
☐ Waiver Request	☐ BPPD
☐ Voluntary Payment Request	Risk Mgr. 25

Receipt Nos. S- 774813

EPA File Symbol/Reg. No. 72167-LN

Pin-Punch Date: 2/18/05

☐ Includes changes to uses – requires routing to contractor coding

Action Code:

Requested: R31.1

Granted: R31.1 Amount due: $ 1,000

VolPay Reduction:

Original Decision #:

___%

D-

Parent/Child Decisions:

72167-LR

Reviewer: [illegible]

Date: 2/24/05

Remarks: (use back if needed)

FFS cover sheet revision 4B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 28, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-354073
EPA File Symbol or Registration Number: 72167-LN
Product Name: TRICLOPYR TEA MC
EPA Receipt Date: 18-Feb-2005
EPA Company Number: 72167
Company Name: NATIONS AG II, LLC

BECKY RHODES
AG RESEARCH OPPORTUNITIES
509 WHITES MILL ROAD
MARYVILLE, TN 37803

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31.1

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY); Reduced Fee: Linked to PRIA Application 72167-LR.

Please remit payment in the amount of: $ 1,000 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how th request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,

Front End Processing Staff
Information Resources and Services Division

Receip for Section 3

S: 774813

Regulatory Type: Product Registration - Section 3

Resubmission: Yes No

Application Type: New Registration

Fee For Service: Yes No

Company: 72167 NATIONS AG II, LLC

Print Letter

Enter More Information

Risk Manager: Registration Division, Risk Management Team 25

Product #: 72167-LN Product Name: TRICLOPYR TEA MC

Overrides:

Me Too Section3: Me Too Product Name:

Application Date: 17-Feb-2005 OPP Rec'vd Date: 18-Feb-2005

Front End Date: 22-Feb-2005 Risk Manager Send Date: 28-Feb-2005

Receipt Content

Study

Fast Track: New Ingredient:

Receipt Description:

Registration of a new mup. This is a child to 72167-LR (LWV).

New Ingredient Request Date:

New Ingredient Received Date:

Form A: Signature Date: Form B: Signature Date:

Receip for Section 3

S: 774813

Regulatory Type: Product Registration - Section 3

Resubmission: Yes No

Application Type: New Registration

Fee For Service: Yes No

Company: 72157 NATIONS AG II, LLC

Print Letter

Enter More Information

Risk Manager: Registration Division, Risk Management Team 25

Product #: 72167-LN Product Name: TRICLOPYR TEA MC

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 17-Feb-2005 OPP Rec'vd Date: 18-Feb-2005

Front End Date: 22-Feb-2005 Risk Manager Send Date:

Receipt Content: Study

Fast Track: New Ingredient:

Receipt Description:

Registration of a new mup.

New Ingredient Request Date:

New Ingredient Received Date:

Form A: Signature Date: Form B: Signature Date:

February 17, 2005

Mr. Jim Tompkins
Product Management Team (25)
Fungicide-Herbicide Branch
Registration Division (H7505C)
Office of Pesticide Programs
Document Processing Desk (APPL)
US Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 South Bell Street
Arlington, VA 22202

Re: TRICLOPYR TEA MC
EPA File Symbol 72167-XXX
Application for Pesticide Registration of a Manufacturing Use Product

Dear Mr. Tompkins:

Nations Ag II, LLC., herewith submits the enclosed "me too" cite-all application for pesticide registration of TRICLOPYR TEA MC (44.4% active ingredient) as a manufacturing use product in accordance with Section 3 of the Federal Insecticide, Fungicide and Rodenticide Act as amended. The me-too reference product is Dow AgroSciences' HAMMER (44.4% active ingredient), EPA Registration No. 62719-53.

The enclosed registration application consists of one administrative volume which contains the following information:

- Transmittal Letter
- Application Form for Pesticide Registration (8570-1)
- A Confidential Statement of Formula (8570-4)
- Five copies of the proposed product labels
- Data Transmittal Document
- A copy of the labeling for the me-too referenced product, HAMMER (44.4% active ingredient), EPA Registration No. 62719-53
- Certification With Respect to Data Citation (8570-34)
- A data matrix listing the studies being cited (8570-35).
- A Letter of Authorization – authorizing me, Becky Rhodes, to represent Nations Ag II, LLC for applications for registration of products containing triclopyr as an active ingredient.

All generic data requirements are being satisfied through citation of all relevant data previously submitted by all triclopyr data submitters.

Product chemistry for this application is being provided by Nations Ag II, LLC as Volume 1 and 2 of this submission. Given that the only new data to be considered for this registration is product chemistry, we respectfully request that this registration application be reviewed on an expedited time frame.

Under separate cover, we are submitting applications for registration of TRICLOPYR TECHNICAL (ACID) and an end use product TRICLOPYR 3 (TEA SALT). TRICLOPYR 3 (TEA SALT) has the same composition as TRICLOPYR TEA MC. We request review and approval of these registration applications simultaneously.

Please contact Becky Rhodes at 865-982-8379 or at BRhodesAgResOpps@aol.com if there are any questions about this submission. Please send all correspondence relevant to this application to Becky Rhodes at 509 Whites Mill Road; Maryville, TN 37803.

Sincerely,

Becky Rhodes

Becky Rhodes
Ag Research Opportunities
Representing Nations AG. II, LLC.

DATA TRANSMITTAL DOCUMENT

1. Name and address of submitter

   Nations AG II, LLC
   4680 Monticello Avenue, 18i-174
   Williamsburg, VA 23188

2. Regulatory action in support of which this package is submitted

   TRICLOPYR TEA MC
   EPA File Symbol 72167-
   Containing Triclopyr: 3, 5, 6-trichloro-2-Pyridinyl)oxyacetic acid, triethylamine salt
   Application for Pesticide Registration

3. Transmittal date

   February 17, 2005

4. List of submitted studies

   Vol 1 Rhodes, M. E., "Triclopyr TEA MC: Product Chemistry Group A", Guideline No. 830.1550, 830.1600, 830.1620, 830.1650, and 830.1670, February 3, 2005, 38 pages.

   MRID # _____

   Vol 2 Weller, P. J., "End-Use Product Chemistry of a 44.4% Triclopyr Triethylamine Salt", Guideline No. 830.1700, 830.1750, and 830.1800, Midwest Research Institute, 425 Volker Boulevard, Kansas City, Missouri 64110-2299; November 16, 2004, 38 pages.

   MRID # _____

Company Official: BECKY RHODES (Name) — Becky Rhodes (Signature)

Company Name: Nations AG. II, LLC

Company Contact: Becky Rhodes (Name) — 865-982-8379 (Telephone)

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [x] Registration
- [ ] Amendment
- [ ] Other

OPP Identifier Number: 278367

Application for Pesticide - Section I

1. Company/Product Number: 72167- LN	2. EPA Product Manager: Jim Tompkins	3. Proposed Classification: [x] None [ ] Restricted
4. Company/Product (Name): TRICLOPYR TEA MC	PM#: 25	
5. Name and Address of Applicant (Include ZIP Code): Nations AG II, LLC, 4680 Monticello Avenue, 18i-174, Williamsburg, VA 23188 [ ] Check if this is a new address	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 62719-53 Product Name HAMMER	

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [x] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

NOTE REGARDING FEE FOR SERVICE: 1) We believe this product falls into category R31 because it is a new me-too product accompanied by product chemistry studies only, and we are using the cite-all method of support; 2) We believe the proper fee is $4,000.00; and 3) You may confirm the proper fee by e-mail to stevel@farmsaver.com and/or by facsimile to 757-565-7476.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[x] Metal [ ] Plastic [ ] Glass [ ] Paper [x] Other (Specify) Plastic-lined
* Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	55 gallon	[x]

6. Manner in Which Label is Affixed to Product: [x] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Becky Rhodes	Consultant Representing Nations Ag II, LLC	865-982-8379

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Becky Rhodes	Consultant Representing Nations Ag II, LLC
4. Typed Name	**5. Date**
Becky Rhodes	February 17, 2005

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

TRICLOPYR TEA MC

For Manufacturing Use Only

ACTIVE INGREDIENT:	
***Triclopyr: (3, 5, 6-trichloro-2-pyridinyl)Oxyacetic acid, triethylamine salt**.....	**44.4%**
INERT INGREDIENTS.....	**55.6%**
Total.....	**100.0%**

Contains 3 pounds of triclopyr acid equivalent per gallon (31.8%)

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx LN
EPA Est. No: xxxx

Net Contents: XXXX

Nations Ag II, LLC
2901-12 Rivendell
Knoxville, TN 37922

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 or clothing	• 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 swallowed	• 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 the 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. In case of a Medical Emergency involving this product, call **1-800-308-5391**.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin, eyes, or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing 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 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 be used to formulate products for specific use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

Only For Formulation into a Herbicide for the Following Use(s):

Aquatic Food Crop and Nonfood:

Non-irrigation canals
Ditches, Non-irrigation ditch banks
Lakes, ponds, reservoirs
Rice
Rights-of-Way
Wildlife habitat areas
Marshes and Wetland Sites

Forestry

Terrestrial Food and Non-Food:

Christmas tree plantations
Industrial areas
Rangeland and pastures
Rights-of-Way, fence rows
Sites associated with wetlands
Turf

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store above 28°F or agitate before use.

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

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

LIMITED WARRANTY, TERMS OF SALE, AND LIMITATION OF LIABILITY

Upon purchase or use of this product, purchaser and user agree to the following terms:

Warranty: Nations Ag II, LLC, (the Company) warrants that this product conforms to the chemical description on the label in all material respects and is reasonably fit for the purpose referred to in the directions for use, subject to the exceptions noted below, which are beyond the Company's control. The Company makes no other representation or warranty, express or implied, concerning the product, including no implied warranty of merchantability or fitness for a particular purpose. No such warranty shall be implied by law, and no agent or representative is authorized to make any such warranty on the Company's behalf.

Terms of Sale: The Company's directions for use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, and the manner of use or application (including failure to adhere to label directions), all of which are beyond the Company's control. All such risks are assumed by the user.

Limitation of Liability: The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damages, and in no event shall damages or any other recovery of any kind exceed the price of the product which caused the alleged loss, damage, injury or other claim. Under no circumstances shall the Company be liable for any special, indirect, incidental or consequential damages of any kind, including loss of profits or income, and any such claims are hereby waived. Some states do not allow the exclusion or limitation of incidental or consequential damages.

The Company and the seller offer this product, and the purchaser and user accept this product, subject to the foregoing warranty, terms of sale and limitation of liability, which may be varied or modified only by an agreement in writing signed on behalf of the Company by an authorized representative.

Nations Ag II, L.L.C
2901-12 Rivendell
Knoxville, TN 37922

TRICLOPYR TEA MC

For Manufacturing Use Only

ACTIVE INGREDIENT:	
***Triclopyr: (3, 5, 6-trichloro-2-pyridinyl)Oxyacetic acid, triethylamine salt.....**	**44.4%**
INERT INGREDIENTS.....	**55.6%**
Total.....	**100.0%**

Contains 3 pounds of triclopyr acid equivalent per gallon (31.8%)

KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx LN
EPA Est. No: xxxx

Net Contents: XXXX

Nations Ag II, LLC
2901-12 Rivendell
Knoxville, TN 37922

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.
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NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

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Environmental Hazards

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Directions for Use

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Rights-of-Way, fence rows
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Turf

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KEEP OUT OF REACH OF CHILDREN

DANGER

EPA Reg. No 72167-xxx LN
EPA Est. No: xxxx

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Nations Ag II, L.L.C
2901-12 Rivendell
Knoxville, TN 37922

PM 25 62719-53

BEST AVAILABLE COPY

DowElanco

PI:2611861

HAMMER*

EPA

Active Ingredient:
triclopyr: 3,5,6,-trichloro-2-pyridinyloxyacetic acid†, triethylamine salt 44.4%
Inert Ingredients 55.6%
Total 100.0%
Acid equivalent: triclopyr†-31.8%-3 lb/gal

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

DANGER

Corrosive • Causes Irreversible Eye Damage • Harmful If Swallowed, Inhaled Or Absorbed Through Skin

Do not get in eyes, on skin, or on clothing. Avoid breathing dust (vapor or spray mist). Wear goggles, face shield or safety glasses, and rubber gloves when handling. Prolonged or frequently repeated skin contact may cause allergic skin reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

First Aid

If in eyes: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Get medical attention.
If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists.
If swallowed: Promptly drink a large quantity of milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician.
If inhaled: Remove victim to fresh air. If not breathing, give artifical respiration, preferably mouth to mouth. Get medical attention.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your state water board or regional office of the EPA.

Physical or Chemical Hazards

Combustible — Do not cut or weld container. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.
Storage: Store above 28°F or agitate before use.
Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excessive 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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.
General: Consult federal, state or local disposal authorities for approved alternative procedures.

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only
This pesticide may be used only for the formulation of herbicides. Formulators using this product are responsible for obtaining EPA registration for their formulated products. Consult

Herbicide

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*Trademark

PM 25 6271[illegible]-53 page 1 of 1

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DowElanco

PI 2611861

AMMER*

edient:
: 3,5,6,-trichloro-2-
ryloxyacetic acid†,
lamine salt 44.4%
lients 55.6%
..... 100.0%
alent: triclopyr†-31.8%-3 lb/gal

utionary Statements

ls to Humans and
stic Animals

Out of Reach of Children

IGER

• Causes Irreversible Eye Damage •
Swallowed, Inhaled Or Absorbed
kin

In eyes, on skin, or on clothing.
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id

Hold eyelids open and flush with a
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Wash with plenty of soap and water.
l attention if irritation persists.
d: Promptly drink a large quantity of
ater, gelatin solution or if these are
e, drink large quantities of water.
bl. Call a physician.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your state water board or regional office of the EPA.

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Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.
General: Consult federal, state or local disposal authorities for approved alternative procedures.

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only
This pesticide may be used only for the

DowElanco for instructions for formulation and other information.
Note: Because of their properties and intended uses, formulations containing Hammer herbicidal chemical may require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own formulations and in accordance with all pertinent laws and regulations.

Warranty Limitations and Disclaimer

DowElanco warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that Seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. DOWELANCO EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely exclusively on any oral or written statements or representations.

In case of an emergency endangering life or property involving this product, call collect 517-636-4400.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-53 EPA Est. 464-MI-1
87291 900-000704

ACCEPTED
MAY 1 3 1993

Lot

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.
Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Nations AG II, LLC.; 4660 Monticello Avenue, 18i-174; Williamsburg, VA 23188	EPA Registration Number/File Symbol 72167-
Active Ingredient(s) and/or representative test compound(s) Triclopyr: 3,5,6-trichloro-2-Pyridinyl)oxyacetic acid, triethylamine salt	Date February 17, 2005
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial and Aquatic Food and Nonfood, including rice; Forestry; Rangeland; Pastures; and Turf	Product Name Triclopyr TEA MC

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☑ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☑ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature Becky Rhodes	Date 2/17/2005	Typed or Printed Name and Title Becky Rhodes, Consultant for Nations Ag II, LLC

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Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date February 3, 2005	EPA Reg No./File Symbol 72167-	Page 1 of 4
Applicant's/Registrant's Name & Addres: Nations AG II, LLC. 4680 Monticello Avenue, 18i-174 Williamsburg, VA 23188	Product: TRICLOPYR TEA MC	

Ingredient: Triclopyr: 3,5,6-trichloro-2-Pyridinyl)oxyacetic acid, triethylamine salt

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition	Volume 1	Nations Ag II, LLC.	OWN	1
830-1600	Description of Materials Used to Produce the Product	Volume 1	Nations Ag II, LLC.	OWN	1
830-1620	Description of Production Process	Volume 1	Nations Ag II, LLC.	OWN	1
830-1650	Description of Formulation Process	Volume 1	Nations Ag II, LLC.	OWN	1
830-1670	Discussion of Formation of Impurities	Volume 1	Nations Ag II, LLC.	OWN	1
830-1700	Preliminary Analysis	Volume 2	Nations Ag II, LLC.	OWN	2
830-1750	Certified Limits	Volume 2	Nations Ag II, LLC.	OWN	2
830-1800	Enforcement Analytical Method	Volume 2	Nations Ag II, LLC.	OWN	2

Volume 1 is Rhodes, M. E., "Triclopyr TEA MC: Product Chemistry Group A", February 3, 2005, 38 pages, submitted herewith

Volume 2 is Weller, P. J., "End-Use Product Chemistry of a 44.4% Triclopyr Triethylamine Salt", November 16, 2004, 38 pages, submitted herewith

Signature Becky Rhodes	Name and Title: Becky Rhodes Consultant Representing Nations Ag. II, LLC	Date: 2/3/2005

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DATA MATRIX

Date February 3, 2005			EPA Reg No./File Symbol 72167-		Page 2 of 4
Applicant's/Registrant's Name & Addres:	Nations AG II, LLC. 4680 Monticello Avenue, 18i-174 Williamsburg, VA 23188		Product: TRICLOPYR TEA MC		
Ingredient: Triclopyr: 3,5,6-trichloro-2-Pyridinyl)oxyacetic acid, triethylamine salt					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
All Other Studies: Cite-All		Cite-All	The Dow Chemical Co.	PAY	
	Offers to Pay have been sent to:		1803 Building		
			Midland, MI 48674		
			The Scotts Company	PAY	
			14111 Scottlawn Road		
			Marysville, OH 43041		
			United Phosphorous Inc.	PAY	
			423 Riverview Plaza		
			Trenton, NJ 08611		
			Nufarm Americas Inc.	PAY	
			1333 Burr Ridge Parkway, Suite 125A		
			Burr Ridge, IL 60527		
			Dupont Crop Protection	PAY	
			Stine Haskell Research Center		
			PO Box 30		
			Newark, DE 19714		
Signature Becky Rhodes			Name and Title: Becky Rhodes Consultant Representing Nations Ag. II, LLC		Date: 2/3/2005

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DATA MATRIX

Date February 3, 2005			EPA Reg No./File Symbol 72167-		Page 3 of 4
Applicant's/Registrant's Name & Addres:	Nations AG II, LLC. 4680 Monticello Avenue, 18i-174 Williamsburg, VA 23188		Product: TRICLOPYR TEA MC		
Ingredient: Triclopyr: 3,5,6-trichloro-2-Pyridinyl)oxyacetic acid, triethylamine salt					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
All Other Studies: Cite-All		Cite-All	Micro-Flo Company LLC	PAY	
	Offers to Pay have been sent to:		530 Oak Court Drive		
			Memphis, TN 38117		
			Dow Agrosciences, LLC	PAY	
			9330 Zionsville Rd		
			Indianapolis, IN 46268		
			UPM Corporation	PAY	
			28 Garrett Avenue		
			Rosemont, PA 19010		
			The Ortho Business Group	PAY	
			D/B/A The Scotts Company		
			PO Box 190		
			Marysville, OH 43040		
			Monsanto Co.	PAY	
			1300 I Street, NW		
			Suite 450 East		
			Washington, DC 20005		
Signature Becky Rhodes			Name and Title: Becky Rhodes Consultant Representing Nations Ag. II, LLC		Date: 2/3/2005

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DATA MATRIX

Date February 3, 2005			EPA Reg No./File Symbol 72167-		Page 4 of 4
Applicant's/Registrant's Name & Addres:	Nations AG II, LLC. 4680 Monticello Avenue, 18i-174 Williamsburg, VA 23188		Product: TRICLOPYR TEA MC		
Ingredient: Triclopyr: 3,5,6-trichloro-2-Pyridinyl)oxyacetic acid, triethylamine salt					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
All Other Studies: Cite-All		Cite-All	Central Garden & Pet	PAY	
	Offers to Pay have been sent to:		PO Box 2289		
			Clackamas, OR 97015		
			Lebanon Seaboard Corporation		
			1600 East Cumberland Street		
			Lebanon, PA 17042		
			Bayer Advanced		
			A Business Unit of Bayer Crop Science LP		
			95 Chestnut Ridge Road		
			Montvale, NJ 07645		
No offer to Pay was sent to the Spray Drift Task Force and the Agricultural Reentry Task Force since Nations Ag II is a member of these task forces.					
Signature Becky Rhodes			Name and Title: Becky Rhodes Consultant Representing Nations Ag. II, LLC		Date: 2/3/2005

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Nations Ag II

September 11, 2004

Mr. Jim Tompkins
Product Management Team (25)
Fungicide-Herbicide Branch
Registration Division (H7505C)
Office of Pesticide Programs
Document Processing Desk (APPL)
US Environmental Protection Agency
Crystal Mall 2, Room 266A
1801 South Bell Street
Arlington, VA 22202

Re: TRICLOPYR 3
EPA File Symbol 72167-GG
TRICLOPYR BUTOXYETHYL ESTER TECHNICAL
EPA File Symbol 72167-GU
TRICLOPYR TECHNICAL
EPA File Symbol 72167-GL
TRICLOPYR TRIETHYLAMINE SALT CONCENTRATE
EPA File Symbol 72167-GA

Dear Mr. Tompkins:

Nations Ag II, LLC, hereby authorizes Mrs. Mary E. (Becky) Rhodes to represent Nations Ag II, LLC in discussions and correspondence regarding the applications for registration referenced above as well as any future applications for registration of products containing triclopyr as an active ingredient.

Sincerely Yours,

J. Steve Lovell
Vice President, Regulatory Affairs
Nations AG. II, LLC.

Pages 70-81 - *Confidential Statements of Formula may be entitled to confidential treatment*