

ICI Americas Inc.

Agricultural
Chemicals
Division

March 20, 1987

Mr. Patrick J. McGourty
Registration Specialist
Chemical and Feed Division
Idaho Dept. of Agriculture
120 Klotz Lane
P. O. Box 790
BOISE ID 83701

Dear Mr. McGourty:

Re: Special Local Need Registration Section 24(c)
Chevron Chemical Co. and ICI Americas Inc.
GRAMOXONE® SUPER Herbicide (Paraquat)

ICI Americas Inc. have purchased from Chevron Chemical Company all rights associated with paraquat and ORTHO Paraquat products. As you may well be aware, paraquat is an ICI invention and was licensed to Chevron some 25 years ago. A letter from Ms. Jackie DiMaggio of Chevron Chemical Company was forwarded to you during the month of November regarding this matter.

ICI Americas Inc. have made a major effort to improve the safety of paraquat herbicide. The new safer product is called GRAMOXONE SUPER Herbicide. Unlike other paraquat products, GRAMOXONE SUPER Herbicide is distinctively colored, and contains as well a powerful emetic and a stenching agent. We believe these properties should make the accidental oral ingestion of paraquat virtually impossible.

ICI has made a considerable effort to recall Chevron's paraquat product from the channels of trade, and we have ceased manufacturing our previous GRAMOXONE product. Therefore, little or no Chevron Ortho Paraquat + Plus or ICI GRAMOXONE (2 lb per gallon) product will be available during the 1987 season.

GRAMOXONE SUPER Herbicide is a 1.5 lb ai/gal formulation and sufficient quantities of the new product are now available. This new product is federally registered and is also registered with your state. A confidential statement of formula including additional information on safety was forwarded with our state registration application.

We are therefore requesting that the Chevron special local need registration as well as the existing ICI Americas Inc. registration of GRAMOXONE listed below be withdrawn. These registrations are to be replaced with an ICI Americas SLN using our new product GRAMOXONE SUPER. Where there is an existing SLN for the same use from both ICI and Chevron, only one label for the new product is requested.

<u>SPECIAL LOCAL NEED REGISTRATIONS TO BE WITHDRAWN</u>		<u>SLN APPLICATION FOR APPROVAL</u>	
<u>Chevron Chemical Co. SLN</u>	<u>Crop</u>	<u>GRAMOXONE SUPER Re-registration</u>	
		<u>Yes</u>	<u>No</u>
ID760004	Wheat		X
ID810043	Potatoes		X
<u>ICI Americas Inc. SLN</u>	<u>Crop</u>		
ID820026	Wheat	X	
ID820023	Potatoes	X	

Please let me know your preference in reregistering GRAMOXONE SUPER as a Section 24(c) special local need product; i.e., retain one of the old SLN numbers for existing registrations or issue a new number and cancel the old registration.

To facilitate this change, included with this letter are the following documents:

- An EPA form for registering GRAMOXONE Super for each use pattern.
- A proposed label.
- As a courtesy, the Chevron letter.

Respectfully submitted,


 Paul Ekoniak
 Senior Registration Specialist

PE-2-60A/REG
 100/REG #18



SUPER
HERBICIDE

RESTRICTED USE PESTICIDE. 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.

**REGISTRATION FOR SPECIAL LOCAL NEED
FOR DISTRIBUTION AND USE ONLY
WITHIN THE STATE OF IDAHO**

GRAMOXONE® SUPER Herbicide

EPA Reg. No: 10182-103

DIRECTIONS FOR USE

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

WHEAT: POSTEMERGENCE BROADCAST (SALVAGE) SPRAY FOR THE SUPPRESSION OF VOLUNTEER RYE AND DOWNY BROME (CHEATGRASS) PRESENT IN SUFFICIENT QUANTITIES SO THAT WHEAT YIELD AND QUALITY MAY BE REDUCED -

For Volunteer Rye, use 2/3 to 1 pt. GRAMOXONE SUPER per acre.

For Downy Brome, use 1.0 pt. GRAMOXONE SUPER per acre.

Apply in 20 to 40 gals. spray mix per acre as a ground broadcast application, or in 5 to 20 gals. spray mix by air. Apply after wheat plants have developed five tailed tillers or six inches in height in the spring and prior to emergence of the head from the boot. Failure to comply with these instructions increases the chance of crop injury and may result in illegal GRAMOXONE SUPER residue in the grain. Yield reductions may occur at any stage of growth. Add 8 oz. of a nonionic surfactant per 100 gals. of spray. Do not graze treated fields or feed treated forage or straw to livestock. The salvage spray should only be used when wheat production is in danger of being severely reduced by rye or downy brome (Cheatgrass) competition and where reseeding is the only other alternative. Yield reductions can be expected in exchange for improved quality.

All applicable directions, restrictions and precautions
on the EPA-registered label are to be followed

**This labeling must be in the possession of the user
at the time of pesticide application**

24(C) Registrant: ICI Americas Inc.
Wilmington, Delaware 19897

EPA SLN No. ID

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (WH-567) WASHINGTON, D.C. 20460 APPLICATION FOR/NOTIFICATION OF STATE REGISTRATION OF A PESTICIDE TO MEET A SPECIAL LOCAL NEED PURSUANT TO 40 CFR PART 162, SUBPART 6 AND SECTION 24 (C) OF THE FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT, AS AMENDED IMPORTANT: SEE REVERSE BEFORE COMPLETING/ SUBMITTING THIS FORM.	FOR EPA USE ONLY	FOR STATE USE ONLY
	90th DAY	Registration Number Assigned
	APPROVED DISAPPROVED DATE- Federal Register Notice	Date Registration was Issued Expiration Date
1. NAME AND ADDRESS OF APPLICANT FOR REGISTRATION ICI Americas Inc. P. O. Box 208 Goldsboro, NC 27533-0208	2. PRODUCT IS: (CHECK ONE) <input type="checkbox"/> New (not EPA-registered) <input checked="" type="checkbox"/> EPA-REGISTERED (give number) EPA Reg. Number <u>10182-103</u>	3. EPA COMPANY NUMBER 4. EPA ESTABLISHMENT REGISTRATION NUMBER
5. PRODUCT NAME <u>Wheat</u> GRAMOXONE SUPER Paraquat Herbicide	6. TYPE OF REGISTRATION: (give details in item 11 or on a separate page, properly identified and attached to this form) <input type="checkbox"/> a. To permit use of a new product. <input checked="" type="checkbox"/> b. To amend EPA registrations for one or more of the following purposes: <input checked="" type="checkbox"/> 1. To permit use on additional crops or animals. <input type="checkbox"/> 2. To permit use at additional sites. <input type="checkbox"/> 3. To permit use against additional pests. <input type="checkbox"/> 4. To permit use of additional application techniques or equipment. <input type="checkbox"/> 5. To permit use at different application rates. <input type="checkbox"/> 6. To prescribe special label directions for one or both of the following purposes: <input type="checkbox"/> a. Preventing unreasonable adverse effects on man or the environment under local use conditions. <input type="checkbox"/> b. Providing for local use conditions affecting pesticide efficacy. <input type="checkbox"/> c. To serve other purposes.	
7. NATURE OF SPECIAL LOCAL NEED: (CHECK ONE) <input type="checkbox"/> a. There is no pesticide product regis- tered by EPA for such use. <input checked="" type="checkbox"/> b. There is no EPA-registered pesti- cide product which, under the con- ditions of use within the State, would be as safe and/or as effi- cacious for such use within the terms and conditions of EPA regis- tration. <input type="checkbox"/> c. An appropriate EPA-registered pesti- cide product is not available.	8. IF THIS IS A FOOD/FEED USE REQUIRING TOLERANCES OR OTHER RESIDUE CLEARANCES, CITE APPROPRIATE REGULATIONS IN 40 CFR 180, 21 CFR 123, AND/OR 21 CFR 561. 9. IS THIS REGISTRATION FOR A "CHANGED USE PATTERN" AS DEFINED IN 40 CFR 162. 152(c)? <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	
10. HAS AN EPA REGISTRATION OF, OR EXPERI- MENTAL USE PERMIT FOR THE PRODUCT EVER BEEN SOUGHT, ISSUED, DENIED, CANCELLED, OR SUSPENDED? <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES	11. COMMENTS ICI Americas Inc. SLN ID820026	
12. HAS A REGISTRATION OF THE PRODUCT (UNDER SECTION 24(C)) EVER BEEN SOUGHT FROM, OR DENIED OR REVOKED BY, ANOTHER STATE? <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES	SIGNATURE OF APPLICANT OR AUTHORIZED REPRESENTATIVE <i>Paul E. Smith</i>	
SIGNATURE OF APPLICANT OR AUTHORIZED REPRESENTATIVE		TITLE <u>Senior Registration Specialist</u> TELEPHONE <u>919-731-5338</u> DATE <u>1-28-87</u>
DETERMINATION BY STATE AGENCY		
This registration is related to a Special Local Need, as defined in 40 CFR 162.152(k), and is being issued in accordance with the approved State Plan and the Regulations at 40 CFR Part 162 Subpart B. To the best of our knowledge, the information above is correct, except as noted in COMMENTS below or in attachments.		
COMMENTS (BY STATE AGENCY ONLY)		RECEIVED BY EPA-OPP, REGISTRATION DIVISION, WASHINGTON, D.C. 20460
NAME AND TITLE OF STATE AGENCY OFFICIAL	TELEPHONE NUMBER	
SIGNATURE OF STATE AGENCY OFFICIAL	DATE	