



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE

PO Box 42560 • Olympia, Washington 98504-2560 • <http://agr.wa.gov> • (360) 902-1800

December 21, 2010

Dan Rosenblatt, Branch Chief
Risk Integration, Minor Use, and Emergency Response Branch
U.S. EPA Office of Pesticide Programs – 7504 P
Document Processing Desk (SLN)
Room S-4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

RE: EPA SLN Reg. No. WA-100008

Enclosed is Washington Special Local Need (SLN) registration number WA-100008 issued to United Phosphorus, Inc for the use of Asulox Herbicide (EPA Reg. No. 70506-139) on alfalfa grown for seed to control several species of weeds. This registration was issued under authority of Section 24(c) FIFRA.

There is a need in Washington for an herbicide to control several species of weeds in alfalfa grown for seed, according to Dr. Rick Boydston (USDA). Most of the herbicide active ingredients that are currently registered on alfalfa grown for seed are: (1) only effective on grass weeds, (2) not labeled for use in new plantings, or (3) not effective against difficult to control weeds (such as common groundsel and prickly lettuce). In addition, biotypes of common groundsel and prickly lettuce that are resistant to certain herbicides are known to occur in Washington. Asulam sodium salt (the active ingredient in Asulox) can be used on new or established plantings, is effective against common groundsel and prickly lettuce, and has a different mode of action than the currently registered active ingredients. WSDA has received letters in support of this SLN registration from Dr. Boydston and from Mr. Timothy Wagoner (Washington Alfalfa Seed Commission).

A tolerance for residues of asulam sodium salt on alfalfa grown for seed is not required, since this crop is considered to be a non-food and non-feed use in Washington. Specific restrictions to preclude use for food or feed purposes have been included on the SLN label, consistent with WSDA rules (Washington Administrative Code 16-228-1270).

WSDA has issued this SLN registration with an expiration date of December 31, 2015.

If you have any questions, please contact me at (360) 902-2078 or by e-mail at ejohansen@agr.wa.gov.

Sincerely,

PESTICIDE MANAGEMENT DIVISION


Erik W. Johansen
Special Pesticide Registration Program Coordinator

enclosure

cc: Rebecca Clemmer, UPI

Rick Boydston, USDA





United States Environmental Protection Agency
Office of Pesticide Programs
Registration Division (TS-767)
Washington, DC 20460

Application for/Notification of State Registration of a Pesticide To Meet a Special Local Need
(Pursuant to Section 24(C) of the Federal Insecticide, Fungicide, and Rodenticide Act, as Amended)

For State Use Only

Registration No. Assigned
WA-100008

Date Registration Issued
12/21/2010

1. Name and Address of Applicant for Registration United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406		2. Product is (Check one) <input checked="" type="checkbox"/> EPA Registered <input type="checkbox"/> New (not EPA-registered) <input type="checkbox"/> Attach EPA Form 8570-4, Confidential Statement of Formula, fix now products.		EPA Registration Number 70506-139	EPA Company Number 70506
4. Product Name Asulox Herbicide		3. Active Ingredient(s) in Product asulam			
6. Type of Registration (Give details in Item 13 or on a separate page, property identified and attached to this form). a. To permit use of a new product. 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) Other (specify below).		5. If this is a food/feed use, a tolerance or other residue clearance is required. Cite appropriate regulations in 40 CFR Part 180, 185, and/or 186. n/a			
10. Has FIFRA section 24(c) registration for this use of the product ever, by another State, been (check appropriate box(es), if known): <input type="checkbox"/> Sought <input type="checkbox"/> Issued <input type="checkbox"/> Denied <input type="checkbox"/> Revoked If any of the above are checked, list States in item 13 below <input checked="" type="checkbox"/> No FIFRA section 24(c) Action		7. Nature of Special Local Need (check one) <input type="checkbox"/> There is no pesticide product registered by EPA for such use. <input checked="" type="checkbox"/> There is no EPA-registered pesticide product which, under the conditions of use within the State, would be as safe and/or as efficacious for use within the terms and condition of EPA registration <input type="checkbox"/> An appropriate EPA-registered pesticide product is not available.			
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 knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. If this registration is an amendment to an EPA-registered product, is it for a "new use" as defined in 40 CCFR 152.3? <input type="checkbox"/> Yes (discuss in item 12 below) <input checked="" type="checkbox"/> No			
Signature of Applicant or Authorized Representative <i>Rebecca A. Clewmer</i>		9. Has an EPA Registration or Experimental Use Permit for this chemical ever been (check applicable box(es), if known): <input type="checkbox"/> Sought <input type="checkbox"/> Issued <input type="checkbox"/> Denied <input type="checkbox"/> Canceled <input type="checkbox"/> Suspended <input type="checkbox"/> Registration <input type="checkbox"/> Experimental Use Permit <input checked="" type="checkbox"/> No Previous Permit Action			
Title Regulatory Manager		11. Endangered Species Act: (Give details in Item 13 or on a separate page, properly identified and attached to this form) Identify the counties where this pesticide will be used. If Statewide, Indicate "all". Provide a list of Federally protected endangered/threatened species which occur in the areas of proposed use.			
Telephone Number 610-491-2828		12. Indicate use statue of Special Local Need, i.e., planned dates of use: From: _____ To: _____			
Date <i>7/21/10</i>		13. Comments (attach additional sheet, if needed)			

Determination by State Agency

This registration is for a Special Local Need and is being issued in accordance with section 24(c) of FIFRA as amended. To the best of our knowledge, the information above is correct, except as noted in "Comments" below or in attachments.

Name, Title, and Address of State Agency Official Erik W. Johansen, Special Pesticide Registration Program Coordinator WSDA, Pesticide Management Division PO Box 42560 Olympia, WA 98504-2560		Comments (by State Agency Only) <i>Non-food and non-feed use.</i>	Received by EPA
Title <i>Erik W. Johansen</i>			
Telephone Number <i>360-902-2078</i>	Date <i>12/21/2010</i>		