

US Environmental Protection Agency Office of Pesticide Programs

Petition for Etoxazole Tab E - Reduced Risk Petition/
OP Replacement Petition
MRID 45630502 Secure Miticide Reduced Risk Petition

August 11, 2010

Guideline Reference Number 850 2350	Guite fine Study Name Effects On Reproduction in Botwhise Qual After Distary	MRID Number	Submiller Valent U.S.A. Corporation	Stalus	Note
850 2300	5-1283. Effection On Reproduction in Meterd Duck After District Activities Activities and Control of the Contro		Valent U.S.A. Corporation	CWIN	
72.1	S-1783 Acute Taxicity to Bluegill Suefatril, sponile manochirus)	45089211	Valent USA Corporation	OWN	
13.1	S-1283 Acute Tortoty to Rambow TroutOncarbynchus mykes)	45063912	Valent USA Corporation	OVM	
72-1	Screening Study to Establish the Relative Acute Tortely of 45089913 Five Attabolites of S. 1263 to Bloagif Sunth Caparnis macrochina) Under Statte-Renewal Conditions	45089913	Valent USA Composition	OWN	
13.1	Screening Study to Establish the Relative Acuts Toxicity of Five Metabolices of S-1283 to Daphness (Daphness magna) Under Static Conditions.		Vsient USA Corporation	OWN	
825 1075	Etbuszole Technical Grade - Aquie Toxicay to Smeraed Minnow (Cypsinedon variegatus) Under Flow Through Gonditons		Valent U.S.A. Corporation	OWN	
550 1010	5-1283 TG - Apula Toxicity to Dephilds (Diphris magne) Under Flow-Through Conditions	45080314	Valent USA Carporation	CWN	
850, 1025	Elonazole Technical Grado - Acute Toricity to Itanien Oystera (Cressustrea virginica) under Flow-Theough Conditions		Valent U.S.A. Corporation	OWN	
650.1035	Elosabole Technical Grade - Acate Toxiday to Mysids (Mysidopsis batids) under Flow-Through Conditions		Valent U.S.A. Corporation	NMO	
12.4	[14GEboxezole - Life Cycle Trixicity Test with Myside (Americantysis bable)		Valent U.S.A. Corporation	NWO	
850 1350	[140] S. 1283 - The Full Life, Cycle Toxicity Test With Warre Fless (Dephnia magna) Under Flow-Through Conditions		Valent U.S.A. Corporation	OWN	
180 1400	5-1283 TG - Early Life-Singe Toxicity Test With Rainbow Trout (Oncorbyschus mykles)		Valent U.S.A. Corporation	OWN	
850.1730	S-1283: Bloscoamulation in Rembow Trout		Valent U.S.A. Corporation	OWN	
YONE	Elozazole 110 gilt, SG Famiulation, Indoor Aquatio Microcoam Study of the Ecological Effects on Danhnia megna		Valerit U.S.A. Corporation	NMO	
81.1	2.5-YI Acute Oral Toxicity to the Ret	45089915		Own	
81-1	H.3 Acute Oral Toxicity to the Rat	45089915		Own	

Guidefare Reference Number	Series Series	MRID Number	Submittee	Status	Mote
81.1	R.7 HCt Sat Acute Oral Toxicity to the Rat	45089917		Own	
670 1100	An Acute Oral Toxicity Study in Rath with V-1283 72 WDG		Valent U.S.A. Corporation	OWN	
81.1	Acute Oral Toxicity to Mice of Yi-5301	45089918	Valent USA Corporation	Own	
11.1	Acute Oral Toxicity to Rala of Vi-5301	45069919	Valent USA Corporation	Own	
670,1100	S-1283 S-WDG: Acute Oral Toxicity Bludy in Rata	45089920	Valent USA Corporation	OWN	
81.2	Acute Dermal Toxiolty to Rats of Yl-5301	4508921	Valent USA Corporation	Own	
875 (20d	An Acute Dermal Toxicity Study in flats with V-1283 72. WDG		Valent U.S.A. Corporation	READY	
570,1200	S-1283 5 WDG. Acute Dermail Toxicity Study in Rate	45069922	Valent USA Corporation	OWW	
870.1300	An Acute Nose-Only Inhalation Toxicity Study in Rate with V 1263 72 WDG		Valent U.S.A Corporation	OWW	
21-23	VI-5301: Acute Inhateton Toxicity Study in Rate	45089923	(Valent USA Carporation	Own	
570 1300	S-1283 5 WDG Acids (4-Hour) inhalation Toxicity Study in 45080924 the Rat Vie Nose-Only Exposure	45089924	Valent USA Corporation	OWN	
21-4	Eye Initation to the Rabbit of Ph.5301	45089925	Valunt USA Corporation	Own	
870,2400	A Primary Eye Inflation Study in Rabbits with V-1283 72 WOG		Valent U.S.A. Corporation	READY	
670.2400	5-1283 5 WDG. Acute Eye Irritation Study in Riebnis	45089926	Valent USA Corporation	NWO	
670.2500	A Petnary Skin firstation Study in Rabbite with V-1283 72 WDG		Valent U.S.A. Corporation	OWN	
81-5	Skin infation to the Rabbit of Yi-5301	45089927	Valent USA Corporation	CWN	
970 2500	S-1223 5 WDG. Acute Demnel Inflation Study in Rabbits	45089928	Valent USA Corporation	NWO	
70 2630	A Dermal Sensitization Shidy in Galmas Pigs with V-1283 72 WDG Modified Buehler Design		Valent U.S.A. Corporation	NWO	
91-6	Y7-5301: Skin Sanakasion in the Quines Pig Intorporating 45089929 a positive control using formatin)	45089929	Valent USA Corporation	Own	
670,2600	S-1283 5 WDG: Skin Sensitization Study in Guinea Pigs (Bucher Method)	0E5680570	Valent USA Corporation	NWO	
62.1	S-1283: 90-Day Subchrone Oral Toxicity Study in Rats	45089931		Own	
62-1	Y1-5301: 13-Week Out Subchlonic Toxicity Shudy in Dogs 4 Week Dose Range Finding Study	45389932	Valent USA Corporation	OWN	
82.1	VI-5301: 13-Weak Oral Subchrowle Toxicity Shidy in Dogs	45089933		Own	
92.1	VI-5301. 13 Week Drai Subdinnia Toricity Study in Rais 4 45069534 Week Dose Range Finding Bludy	45069934		Own	

Guideline Reference Number	Suideline Study Name	MRID Number	Submitter	Slatus	Note
82-1	VE5301: 13-Week Oral Subchordo Toxicity Study in Rals	45089935	Valent USA Corporation	- C	1000
82.1	Y1-5301 13-Week Oral Subchronic Toxicity Study in Mice	45089936	Valent USA Corporation	OWN	
NONE	YE5301 4-Week Supplementary Shudy in Rats	45089937	Valent USA Corporation	NWO	
NONE	VI-5301 13-Week Oral Subchronic Toxicity Study in Mice 4 Week Dase Range Finding Study	45089938	Valeni USA Carporation	C)WO	
NONE	Y1-5331 13-Yeek Oral Subohooin Toxicity Study in Rath. Additional Study of Effect on Problerative Activity of Testiquier Inferatifial Celts.	45089939		O O	
NONE	V1-5301: 13-Week Craft Subchranic Taxiety in Rate Biochemical and Pathological Analyses for Hepstomegaly	45095040	Valent USA Corporation	Own	
870 3200	26-Day Repeated Dase Dermal Toxicity Study of 5-1283 TG in Rets	45089941	Valent USA Corporation	OWN	
83-1	YL5301, 12-Month Draf Chloric Toxicity Sludy in Dogs	45089942	Valent USA Corporation	Own	
63.2	YI-5391; 18-Month Oral Oncogenicity Study in Mice	45090001	Valent USA Corporation	OWN	
870 4200	S-1283: 18-Month Oral Oncogenicity Shady in Mice	45571801	Valent U.S.A. Corporation	NWO	
83.3	Y1-5301: Teratogenicity Study in Rabbits Preliminary Study	45090002	Valent USA Corporation	OWW	
83.3	Y15301: Teratogenicity Study in Rabbits	45090003	Valent USA Corporation	Own	
63.3	Y1-5301: Teratogenicity Study in Rata Prekminary Study	45090004		Own	
63-3	VI-5301: Teratogenicity Study in Rate	45090005	Valent USA Corporation	Own	
83.4	VI-5301: Two-Ganeration Repreduction Study in Rate Preliminary Study	45090006		Oven	
700	YI-5301: Two-Ceneration Reproduction Study in Rats	45090007		Dwn	
83.5	S-1283: 24-Month Oral Chronic Toxicity and Oricogenieth Study in Rats		Virlant USA Corpotation	DWN	
63-5	YI-5381. 24-Month Oral Chronic Toxicity and Oncogenicity Study in Rats	$\overline{}$	Valent USA Corporation	NWO	
870 4300	S-1283: 24-Month Oral Chronic Toxicity and Oncogenicity Study in Rats	45571802	Valent U.S.A. Corporation	OWN	
84-2	2,5-Yi Beclerial Mutation Assay	45090009	Valuat USA Corporation	Own	
84.2	Micronucleus Test on S-1263 in CO-1 Mice	45080010		Own	
84-2	R-3 Bacteral Mutation Assay	45090011		Own	001701111
84-2	R-7 HCI Self Backeral Mutation Assay	15090012	Volent U.S.A. Comparation	Own	
54-2	S-1283 Mammakan Cell Mulation Assay	45090013	Valent USA Corporation	OWN	

Cultains Beference Komber	27320 00100000	Main Mumber	S. dwardings	Station	Marta
64-2	8-1283. Measurement of Unscheduled DNA Synthesis in	4500014	Valent USA Corporation	NWO	
84.2	Rai Liver Using an In Vivolin Vilro Procedure	44 74 00 04		-	1
1	College in which opposite test	- Avenue		UMU C	
	YI-BUDI HEVERSE MARKING TON	46250905		CMI	
870.5160	Reverse Mutation Test of 8-1283 in Salmonella hyphimusiem Strain TA102	45090015	Valent USA Colporation	NMO	
	14C-YI-5301 Metabolism in the Rat	45090016	Valent USA Corporation	DWM	
(2). ((a)	Tier 1 Seeding Errergence Montanget Phytotoxocky Study Using Stockszole		Valent U.S.A. Corporation	NWO	
122-1(b)	Then 1 Vegetative Vigor Nontarge! Phytotoxicity Study Using Etomazole		Valent U.S.A. Corporation		
950 5400	Ry Y - Toerally to the Freehwater Green Alga. Selensetrum capriconnatum		Valent U.S.A. Corporation	CWN	
858 5400	R-13 - Toxicity to the Freshweller Green Alga, Selenastrum repriconutum		Valent U.S.A. Corporation	NWO	
880 5400	R3 - Toxiony to the Freshwater Green Alga, Salensatrum capricognitum		Valent U.S.A. Corporation	OVA	
650 5400	S-1283: Algal Growth Invitition		Valent U.S.A. Cerporation	CWW	
850 3020	Y1-5301. Acute Toxicity to Honey Bees (Aprs metrins)		Valent U.S.A. Corporation	OWN	
143.1	[14D]S-1283 - Acute Toxicity to Midge (Chlonomus reasous) During A 10-Day Sectioner Exposure Under State Revewal Conditions		Valent U.S.A. Corporation	NWO	
140-1	Assessment of the Practical Medium Term Consequences of PHE 8052 PHLAMBOD Transes, on the Practicus of the Red Mate IP, string and on the Other Australiay Entercoptages in Applie Chehards		Value USA Corporation	OWN	
143.4	A Laboratory Evaluation of the Effects of the Academy 1997 19502, Containing 110 GA, On the Laboving Chrysoperia carnea		Valent U.S.A. Corporation	OWN	
1-92-1	A Lateratory Study to Evakuate the Effects of PHF 9502 Containing 110 g.1. Elosarelle (E-1383) on Advia and Loveribe Life Stages of the Plensitle Wasp Apticities (Rhopaloseph)		Valent U.S.A. Corporator	OWW	
143.1	A Laboratory Study to Fushusin the Effects of PHF 9507 Conteming 110 gr Ejorarote (5.1283) on the Heteropteran Rug Orlus Laevigetus		Valent U B A Corporation	OWN	
143.1	Non Ir enthroat Effects on T. Pyri		Velent U.S.A. Corporation	OWN	

Guestina Rafarence Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Non Target Efects on T. Pyr.		Valent U S A Corporation	CWN	
	Non Target Effects of PHF 6502 on Necestulus cationicus (Agreement Referenced CV22Aff8D (998)		Valent U & A Carporation	CWN	
	Poller Tower Test PHF 9502 on Necretalin celifornicue (Adults) Polter Tower Test with Mile Resing (Agreement) Referenced CV20ARBO 1996)		Valent U.S.A. Corporation	NWO	
	Potter Yover Test PHF 9502 on Typhylodianus pyri (Aduls) (Agreement Referenced CV21ARBO 1996)		Valent USA Corporation	NWO	
	Study of Unistendional Effects of the Product PHF 9502 On Two Populations of T. Pyri		Valent U.S.A. Corporation	NWO	
	The Hydrolysis of YI-5301	45000017	Vatent USA Corporation	OWN	
	14C-VI-5301 Photodegradation in Water	45090018	Valent USA Corporation	COMPA	
	5-1283 Photodegradabon on Soil	45050020	Valent USA Corporation	OWN	
	140.0:1283 Aerobio Sof Matabolism and Route of Degradation	45090013	Valent USA Corporation	NAG	
	Metabolism of (liest-butylphonyl-140) and (diffuorophenyl- 140)s-1283 in Aerobio Sost	45000021	Valeni USA Cerporation	CWN	
	14C-5-1283 Rate of Degradation in Four Solls	45000022	Valent USA Corporation	NWO	
	140-5-1263 Anserobic Soil Metaboham	45090023	Valent USA Corporation	OWN	
	Ansacobic Aquatic Metabotism of (set-butypheny) 140(Etosacole and (diffuonopheny)-140(Etosacole		Valent U.S.A. Corporation	NWO	
	14C-ft-7 Adsorption/Desorption on Soil	45250906	Valent Ligh Corporation	OWN	
	14C-R-B Adhardten/Desorption on Soil	45250907	Valent USA Corporation	OWN	
	14G-B-13 Adsorption/Description on Soil of R-13 A Soil Metabolin of S-1283	45250508	Valent USA Corporation	CVAN	
	14C-5-1253 Adsorption/Desorption on Soil	45090024	Valent USA Corporation	OWN	
	Metabolites R-2, R-4 and R-7 of St-1283 Determination of Sall Adsorption Coefficient (Koc) by HPLC	45000025	Valent USA Corporation	NWO	
	Box Ademption/Description of Etoxazole (8-1263) and its Metabolise, R-13	45090026	Valent USA Corporation	OWN	
	8-1263. Dissipation From Front Fleid Soils	45220909	Valent USA Corporation	OWN	
	Terrestrial Field and Sad Dissipation of Elexation on these Gound in California		Valent U.S.A. Corporation	OWN	
	Tarrestrial Field Sol Discipation of Eloxatole on Bare Ground in Ideho		Valent U.S.A. Corporation	OWN	
and the same of th	"Aerrestried Fund S., if D. is pation of Ehrasacole on Bare Tround in Masis stops		Valent U.S.A. Corporation	OWN	

Suideline Reference Number	Guideline Study Name	MRID Number	Attempt	Status	Note
850 7100	Independent Laboratory Validation of Valent Method RM. 375-2. "Deferreliation of Etoxacolo, R3 and R13 Metabolies in Solf		Valent U.S.A. Cerporation	Owe	
850.7100	Independent Lebonatory Valdation of Valent Method 10A. 37 BM. "Determination of Eloxasole Metabolites RA. R7, R8. and R1.1 in Bolt".		Valent U.S.A. Corporation	OWN	
880 (850	A Confined Accumulation in Rotational Crops Shuly on (diffuciopheny-145) S-1253 and (lam-buty-145) S-1283 using Whest. Littles and Radish		Valent U.S.A. Corporation	CWN	
860 1340	Independent Laboratory Validation of the Anaytical Method for Determining Residues of Elbrazole in Cottonship		Valent U.S.A. Corporation	OWN	
860.1340	Validation of the Reaktive Analytical Method for S-1283 in Bovine Fat		Valent U.S.A. Cerporation	OWW	
1340	Validation of the Residue Analytical Method for S-1263 in Mrte.		Valent USA Corporation	CWM	
960,1480	Magnitude of the Residue of Etorazole in Dany Cette Mix and Mest		Zelent U.S.A. Corporation	OWW	
850,1500 860,1500	Magnitude of the Residue of Etoxazole on Applies and Processed Applie Products		Valent U.S.A. Corporation	OWN	
860.1500	Magnitude of the Residue of Eloxazole on Pears		Valent U.S. A. Corporation	OWN	
850 1500 850 152 0	Storage Stability of Eloxazole on Apples		Valent U.S.A. Conduction	DWN	
990 1360	14C-VI 5351 The Metaboksm of 14C-VI-5301 in Crenges		Valent U.S.A. Corporation	NWO	
960.1300	The Melabolism of 14C-Y1-5301 In Applier		Valent U.S.A. Corporation	OWN	
AGO 1300	The Metabolism of 14C-YI-5301 in Egg Plants		Valent U.S.A. Corporation	CWN	
60.1300	Malure of Persidues. Retailofram of (set-butyphanyt-14G) and (diffuorophanyt-14G) 5-1283 by Cotton.		VALENT U.S.A. Corporation	OWN	
980 1380	Nature of Residues: Metabotem of Itan-butylphenyi-14G) and Idfiluorephenyi-14GJ 8-1283 in Laying Hens		Valent U.S.A. Corporation	OWN	
950 1300	S-1283, Metaboliers in the Lectering Goat		Valeni U.S.A. Corporation	OWN	
860 1340	Validation of the Estraction Efficiency of the Analytical Method for Christmination of Efocusorie and Methodole R.3. in Coton On Tresh		plent U.S.A. Corporation	OWN	

	CONTRACTOR CONTRACTOR	MATERIAL PRESIDENT	Submiller	Status	Note
	Elevatorie independent Laboratory validation (LV) of the Maid-Prescue Method DFG 519 for the Defermination of Rendues of Elevatorie in Mandarin (Deal and DVb)		Valent U.S.A. Corporation	OWN	
	Independent Laboratory Mothod Validation of Valent Analytical Method RM-37GT-1 for Eforazolt and R3 in Cotton Gin Treath		Valent U.S.A. Corporation	OWN	
	Interprendent Laboratory Valdation of the DFG Method 8 19 with Modified Extraction for the Determination of Resolution of Einzatorie (5-1283) in Specimens of Fullit with High Acid Contant (Chrus).		Vineni U.S.A. Corporation	CWM	
	Validation of DFG feehod S 19 with Addities Extraction for the Determination of Residues of Etoxacole 18-1283) in Field Samples of Froil with High Acid Content (Critics)		Velent U.S.A. Corporation	OWN	
860 1380	Freezer Storage Stability Study of Elocazole (S. 1233) inton Mandarin (Pee) and Pulp)		Valent U.S.A. Corporation	DIVIN	
	Megnituhe of the Readus of Boxazole in Mandarin Raw Agricultural Convendity		Valent U.S.A. Corporation	DWN	
860 1500	Magnitude of the Residue of Bloxazde in Mandarin Rev Agricultural Commodity		Valent U.S.A. Corporation	OWW	
860.1500	Magnitude of the Reactue of Etosazolo in Mandarin Raw Agricultural Commodity		Valent U.S.A. Corporation	OWN	
	Megnetide of the Residue of Elorazole in Mandach Raw Agricultural Commodity		Valent U.S.A. Corporation	OWN	
860 1500 890 1520	Megnitude of the Residue of Etorazola on Cotton and the Processed Products		VALENT USA Corporation	OWN	
	Magnitude of the Residue of Elexatole on Sites/berries		Valent U.S. A. Corporation	OWN	
	Evaluation of Etorazole and Etoxazole Metabolite R-5 Through the PDA Multinesidues Methods		Valent U.S.A. Corporation	DWN	L
	Atomication Droplet Size Spectra for V-1283 72 WDG		Valent U.S.A. Corporation	CAN	
			Valent U.S.A. Corporation	CVA	
	Orcupational Exposure Assessment and Potential Res. of A. Teressant & WDG Applied to Greenhause Ginamanians	45090007	Valent USA Corporation	NWO	

Status Note Ovyn	James W. Penayl, Project Manaper Date 2/15/2002	
Submitter Valent U.S.A. Corporation	Manne and Tife James W. Penay	
MRIID Number		Page 11 of 11
Guidehm Study Name Wakes Request for Postaspication Exposure Data for Elexazole	Sec and Paper versions available	
Guidseine Reference Number 815 3100 815 2200 875 2800 875 2500	Signatum (F) Electronic and Paper versions available	

APPENDIX II- PROPOSED PRODUCT LABEL

SECURETM Miticide

Active Ingredient	By Wt.
*Etoxazole	72%
Other Ingedient	28%
Total	100%
*2-(2,6-difluor ophenyl)-4-[4-(1,1-dimethylethyl)-2-ethoxyphenyl]-4,5-dihydrooxazole	
KEEP OUT OF REACH OF CHILDREN	
REEP OUT OF REACH OF CHILDREN	
CAUTION	
SEE BELOW FOR ADDITIONAL PRECAUTIONARY STATEMENTS	
NET WEIGHT	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes, skin and clothing. Avoid breathing dust.

	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 a poison control center or doctor Do not give anything by mouth to an unconscious person.
lf Inhaled:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear: long-sleeved shirt and long pants, waterproof gloves, and socks plus shoes.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washebies use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- · Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS:

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: Long-sleeved shirt and long-pants, waterproof gloves, and shoes plus socks.

DISCLAIMER, RISKS OF USING THIS PRODUCT, LIMITED WARRANTY AND LIMITATION OF LIABILITY

IMPORTANT: Rend the entire Label including this Disclaimer, Risks of Using this Product, Limited Warranty, and Limitation of Liability before using this product. If the terms are not acceptable THEN DO NOT USE THE PRODUCT; rather, return the unopened product within 15 days of purchase for a refund of the purchase price.

RISKS OF USING THIS PRODUCT

The Buyer and User (referred to collectively herein as "Buyer") of this product should be aware that there are inherent unintended risks associated with the use of this product which are impossible to eliminate. These risks include, but are not limited to, injury to plants and crops to which this product is applied, lack of control of the target pests or weeds to the product, injury caused by drift, and injury to rotational crops caused by carryover in the soil. Such risks of crop injury, non-performance, resistance or other unintended consequences are unavoidable and may result because of such factors as weather, soil conditions, disease, moisture conditions, irrigation practices, condition of the crop at the time of application, presence of other materials either applied in the tank mix with this product or prior to application of this product, cultural practices or the manner of use or application, (or a combination of such factors) all of which are factors beyond the control of Valent. The Buyer should be aware that these inherent unintended risks may reduce the harvested yield of the crop in all or a portion of the treated acreage, or otherwise affect the crop such that additional care, treatment and expense are required to take the crop to harvest. If the Buyer chooses not to accept these risks, THEN THIS PRODUCT SHOULD NOT BE APPLIED. By applying this product Buyer acknowledges and accepts these inherent unintended risks AND AGREES THAT ALL SUCH RISKS ASSOCIATED WITH THE APPLICATION AND USE ARE ASSUMED BY THE

Valent shall not be responsible for losses or damages (including, but not limited to, loss of yield, increased expenses of farming the crop or such incidental, consequential or special damages that may be claimed) resulting from use of this product in any manner not set forth on the label. Buyer assumes all risks associated with the use of this product in any manner or under conditions not specifically directed or approved on the label.

LIMITED WARRANTS

Valent warrants only that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the label, under average use conditions, when used strictly in accordance with the label and subject to the Risks of Using Tais Product as described above. EXCEPT AS SET FORTH ABOVE, VALENT MAKES NO OTHER WARRANTIES, EITHER EXPRESSED OR IMPLIED, No agent or representative of Valent or Seller is authorized to make or create any other express or implied warranty.

LIMITATION OF LIABILITY

In no event shall Valent or Seller be hable for any incidental, consequential, indirect or special damages resulting from the use or handling of this product. The limitation includes, but is not limited to, loss of yield on all or any portion of the treated acrage, 'nerensed eare, treatment or other expenses required to take the crop to harvest, increased finance charges or altered finance ratings, emolocal or mental distress and/or exemplary damages. The exclusive remedy of the buyer, and the exclusive maximum liability of valent or seller for any and all claims, losses, injuries or damages (including claims). Based on Bereach of warranty, contract, negligence, tort, strict liability or otherwise) result in \$6.00 the use or handling of this product shall be the return of the purchase price of this product or, at the election of valent or seller, the replacement of the product.

PROMPT NOTICE OF CLAIM

Valent must be provided notice as soon as Buyer has reason to believe it may have a claim, but in no event later than twenty-one days from date of planting, or twenty-one days from the date of application, whichever is latter, so that an immediate inspection of the affected property and growing crops can be made.

If Buyer does not notify Valent of any claims in such period, it shall be barred from obtaining any remedy.

NO AMENDMENTS

Valent and Seller offer this product, and Buyer accepts it, subject to the foregoing Disclaimer, Risks of Using This Product, Limited Warranty and Limitation of Liability, which may not be modified by any oral or written agreement.

NOTICE: Tank mixing or use of this product with any other product which is not specifically and expressly authorized by the label shall be the exclusive risk of user, applicator and/or application advisor.

Read and follow the entire label of each product to be used in the tank mix with this product,

COTTON

CROP	PESTS	PRODUCT RATE OZ./ACRE	SPECIAL INSTRUCTIONS
Cotton	Twospotted Spider Mite Carmine Spider Mite Pacific Spider Mite	0.66 – 1.0	Apply with air or ground equipment in adequate water for uniform coverage (3 to 10 gals./acre by air or 10 to 50 gals./acre by ground). Coverage is essential for good control. Use of higher water volume will assure better coverage. Best results are achieved when mite populations are low SECURE is predominately an ovicide/larvicide and should be used early in the life cycle of mites. The product should be applied at the threshold for your area. SECURE is not at adulticide and if adult mites are present in medium to high numbers, apply SECURE in combination with a registered contact adulticide. Make a second application if necessary to maintain control but no sooner than 21 days after the first application. Do not make more than 2 applications per season.

MANAGING RESISTANCE: Repeated use of the same class of miticides or miticides with similar modes of action can lead to the buildup of resistant mite strains. SECURE should be used in alternation with other miticides possessing dissimilar modes of action and/or with other chemical classes of miticides. Follow local, state, and federal IPM and Resistance Management (RM) recommendations. Read and follow all product labels before applying any miticide.

POME FRUIT

CROPS	PESTS	PRODUCT RATE OZ./ACRE	SPECIAL INSTRUCTIONS
Pome Fruit such as Apple Pear Crabapple Loquet Quince	European Red Mite McDaniel Spider Mite	2.0 – 3.0	Apply by ground with airblast equipment in a minimum of 50 gals /acre. Coverage is essential for good control. Use of higher water volume will assure better coverage. Best results are achieved when mite populations are low. SECURE is predominately an ovicide/larvicide and should be used early in the life cycle of mites. The product should be applied at threshold for your area. SECURE is not an adulticide and if adult mites are
	Twospotted Spider Mite Pacific Spider Mite	3.0	present in medium to high numbers, apply SECURE in combination with a registered contact adulticide. Make a second application if necessary to maintain control but no sooner than 21 days after the first application. Do not make more than 2 applications perseason. SECURE will not control Rust Mites or Blister Mites. If these pests are a problem, use an alternative miticide registered for that use.

MANAGING RESISTANCE: Repeated use of the same class of miticides or miticides with similar modes of action can lead to the buildup of resistant mite strains. SECURE should be used in alternation with other miticides possessing dissimilar modes of action and/or with other chemical classes of miticides. Follow local, state, and federal IPM and Resistance Management (RM) recommendations. Read and follow all product labers before applying any miticide.

STRAWBERRY

		SIKAW	DERVI
CROP	PESTS	PRODUC T RATE OZ./ACRE	SPECIAL INSTRUCTIONS
Strawberry	Twospotted Spider Mite Pacific Spider Mite	2.0 - 3.0	Apply with ground equipment in a minimum of 100 gallons/acre. Coverage is essential for good control. Use of higher water volume will assure better coverage. Best results are achieved when mite populations are low. SECURE is predominately an ovicide/larvicide and should be used early in the life cycle of mites. The product should be applied at threshold for your area. SECURE is not an adulticide and if adult mites are present in medium to high numbers, apply SECURE in combination with a registered contact adulticide. Do not make consecutive applications with SECURE. If an additional application is needed after applying SECURE, use another miticide with a dissimilar mode of action or different class of chemistry. Do not make more than 2 applications of SECURE per season. SECURE will not control Cyclamine Mite. Another miticide registered for this pest should be used if these mites are a problem.
	Lygus Spittle Bug Tarnished Plant Bug	0.66 – 1.0 + DANITOL® (0.2 lb. ai/A)	Apply with ground equipment in adequate water for uniform coverage (100 to 300 gals./acre). Alternate with other non-pyrethroid insecticides if retreatment is needed in less than 30 days to comply with local IPM programs. Comply with all applicable directions, restrictions, and precautions on the registered label for Danitol 2.4 FC.

MANAGING RESISTANCE: Repeated use of the same class of miticides or miticides with similar modes of action can lead to the buildup of resistant mite strains. SECURE should be used in alternation with other miticides possessing dissimilar modes of action and/or with other chemical classes of miticides. Follow local, state, and federal IPM and Resistance Management (RM) recommendations. Read and follow all product labels before applying any miticide.

STORAGE AND DISPOSAL

PROHIBITIONS

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

STORAGE

Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in cool, dry place. Do not store diluted spray.

EMERGENCY RESPONSE: For help with any spill, leak, fire or exposure involving this material, call day or night 1-800-892-0099.

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). Do not reuse container. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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DANITOL® - Reg. TM of Valent U.S.A. Corporation SECURE™ - TM of Valent U.S.A. Corporation

Manufactured for Valent U.S.A. Corporation P.O. Box 8025 Walnut Creek, CA 94596-8025 www.valent.com Made in U.S.A.

EPA Reg. No. 59639-XXX EPA Est. No.

APPENDIX III - ECOLOGICAL EFFECTS COMPARATIVE RISK ASSESSMENT TABLES AND GENEEC CALCULATIONS

ECOLOGICAL EFFECTS COMPARATIVE RISK ASSESSMENT

Etoxazole has been compared to eight competitive products, which have the same or similar pest spectra as etoxazole and are the active ingredients in the products found to be used in pome fruit, cotton, and strawberry agriculture. The selection of these chemicals and their relative market shares in these crops were based on marketing data from Doane Marketing Research, Inc., Richard F. Buhn's publication, "Insecticide And Acaricide Usage On Tree Fruit, Vines, Citrus And Nuts", and Summary Of Pesticide Use Report Data published by the California Department Of Pesticide Regulation.

Etoxazole is compared to each of these eight compounds for Estimated Environmental Concentrations (EEC) and risk. The Tier 1, screening-level assessments of risk provided here are based on environmental fate and ecological toxicity data from various sources (See References). Environmental fate data as well as maximum label rates, maximum application frequency and number of applications are tabulated by crop. The EEC's were calculated using GENEEC v. 2.0.

The ecotoxicity data is presented for all compounds by endpoint. Included are acute toxicity to three fish and three invertebrate species (including saltwater organisms), chronic toxicity to fish and freshwater and saltwater invertebrates, acute oral LD₅₀'s and dietary LC₅₀'s for two avian species, and chronic (reproduction) data for two species of birds.

The screening-level risk estimates for aquatic organisms are based on the EEC divided by the low-est ecotoxicity value for each ecotoxicology endpoint by crop across all compounds. The 4 Day average EEC was used to derive the acute RQ values; the 21-day average EEC was used to derive the chronic RQ values for invertebrates; and the 60-day average EEC was used to derive the chronic RQ values for fish.

The screening-level risk estimates for avian species were calculated by dividing the perly residue on short rangegrass (derived from Kenega) by the lowest ecotoxicity value for each avian endpoint by crop across all compounds.

RQ values greater than one indicate high risk while values less than 0.1 indicate minimal risk.

The risk assessment for etoxazole in this document was conducted to compare the risks associated with the use of SECURE Miticide to those of the competitive products. More thorough ecological risk assessments (Tier 1 and Tier 2) for etoxazole have been conducted and are presented in Section G of the Secure Miticide tolerance petition, which has been submitted to EPA concurrently with this reduced-risk petition.

Application Data Used to Perform GENEEC Calculations (all values in ug/l; ppb)

Pome Fruits Products

Active Ingredient	Clofentezine	Etoxazole	Pyridaben	Hexythiazox	Fenbutatin-oxide
Label Name	Apollo	Secure	Pyramite	Savey 50 WP	Vendex 50 WP
Maximum Appl. Rate (lbs a.i./A)	0.25	0.135	0.5	0.19	1.0
Maximum No. Appl/yr.	1	2	2	1	2
# Days between appl.	NA	21	30	NA	0

Cotton Products

Active Ingredient	Etoxazole	Propargite	Profenofos	Dicofol	Aldicarb
Label Name	Secure	Comite	Curacron 8E	Kelthane MF	Temik
Maximum Appl. Rate (lbs a.i./A)	0.045	1.6	1.0	1.5	16.5 ²
Maximum No. Appl./yr.	2	3	5 ¹	1	2
# Days between appl.	21	7	5	NA	ð

Strawberry Products

Active Ingredient	Etoxazole	Hexythiazox	Fenbutatin-oxide	Propargite
Label Name	Secure	Savey 50 WP	Vendex 50 WP	Omite
Maximum Appl. Rate (lbs a.i./A)	0.135	0.19	1.5	1.92
Maximum No. Appl/yr.	2	1	3	2
# Days between appl.	21	NA	0	21

Label allows 6 applications but RED limits seasonal total to 5 lbs.a.i/A.
 Label allows 20 lbs. a.i/A per application but limits seasonal total to 33 lbs. a.i/A

Environmental Data Used to Perform GENEEC Calculations

Active Ingredient	Clofentezine	Etoxazole	Pyridaben	Hexythiazox	Fenbutatin Ox	Propargite ¹	Profenofos	Dicofol ¹	Aldicarb
Koc	11,000	17150 ²	NA ³	620 0	2300	2963	840	5868	30
Soil aerobic metabolism (t _{1/2}) (days)	56	284	⊲1	35	>180	504	8	43	30
Wetted in?	No	No	No	No	No	No	No	No	No
Incorporation depth (in.)	0	0	0	0	0	0	0	0	2
Application Method	Ground	Grd & Air	Ground	Air	Air ⁶	Ground	Ground	Air	Ground
Water Solubility (pH 7)(ppm)	1.00	0.070	0.012	0.05	0.013	0.62	28	1.32	6000
Aerobic aquatic metabolism (t _{1/2})(days)			-			114			-
Hydrolysis ((t _{1/2})(days)(pH 7)	1.43	161	Stable	Stable	Stable	45-75	14.6	2.7	Stable
Aqueous Photolysis ((t _{1/2})(days)	<7	17.4	0.02	16.6	>100	140		30	11.9

¹Values for this product taken from Reregistration Eligibility Document (RED)

²Mean of 8 values, ranging from 4910 to 55,275

³ Data not available-use 4910 (minimum K_{oc} for etoxazole) for comparison purposes

⁴EPA t-test on 8 values

⁵Aerial application of etoxazole 's limited to cotton ⁶Requires 125 ft. buffer

Summary of Aquatic Estimated Environmental Concentrations

(EEC's, expressed in ppb)

Pome Fruits Products

Active Ingredient	Clofentezine	Etoxazole	Pyridaben	Hexythiazox	Fenbutatin-oxide
4-Day Average ¹	1.23	2.68	5.28	3.03	13.0
21-Day Average ²	0.27	2.58	1.49	3.02	13.0
60-Day Average ³	0.10	2.36	0.52	3.00	13.0

Cotton Products

Active Ingredient	Etoxazole	Propargite	Profenofos	Dicofol	Aldicarb
4-Day Average	0.924	80.06	55.39	12.62	953
21-Day Average ²	0.889	76.05	38.49	3.73	949
60-Day Average ³	0.814	67.83	20.11	1.31	941

Strawberry Products

Active Ingredient	Etoxazole	Hexythiazox	Fenbutatin-oxide	Propargite
4-Day Average ¹	2.51	3.03	13.0	63.6
21-Day Average ²	2.41	3.02	13.0	60.4
60-Day Average ³	2.21	3.00	13.0	53.9

Used for calculation of acute risk quotients
 Used for calculation of chronic risk quotients for invertebrates
 Used for calculation of chronic risk quotients for fish

GENEEC Simulation - Clofentezine on Pome Fruit

	O) No.APPS					AY INCOR
ONE (MULT)	INTERVAL	Koc	(PPM)	(%DRIE	T) (FT)	(IN)
	50) 1 1					
FIELD AND S	STANDARD POND	HALFLIFE	VALUES (DAYS)		
	DAYS UNTIL RAIN/RUNOFF					
56.00	2	1.43	7.00-	868.00	.00	1.43
GENERIC EEC	Cs (IN MICROG	RAMS/LITER	(PPB))			
GEEC	MAX 4 DAY AVG GEEC					
	1.23		27	.10)	.06

GENEEC Simulation - Etoxazole on Pome Fruit

						(PPB)	(%DRI	TYPE NO-SPE FT) (FT)	(IN)
.135(215)	2	21	17150.0			9.7)	
				7.5	HALFLIFE		A THE PARTY OF THE		
METABO (FIE)	DLIC	DAYS	UN'	TIL NOFF	HYDROLYSI: (POND)	S PHOT (PON	OLYSIS D-EFF)	METABOLIC (POND)	(POND)
								.00	
20.					RAMS/LITE		2137100		117.02
GENER)									
PE	EAK				AVG	GEEC	AVG G	DAY MAX SEC AV	GEEC

GENEEC Simulation - Pyridaben on Pome Fruit

N	No.	1	FOR	Pyrid	aben.		ON	Pome	Fruit	* I	NPUT VA	ALUES *		
				No.APPS INTERVAL										
,	500 (110	. 686	586) 2 30		4910.0		12.0	ORCHAF	(9.	7)	.0	.0	
F	TIELD	ANI	ST/	ANDARD	PONE	HAL	FLIFE	VALUES	(DAYS)					
M				DAYS UNTIL RAIN/RUNOFF										
33	21.00 2			N	/A	.02-	2.4	8	.00	2	.48			
G	GENERIC EECs (IN MIC		ICROG	RAMS	/LITE	R (PPB))								
	PEAK MAX 4 DA GEEC AVG GEEC													
-		8.76	 ŝ	8.76 5.28			1	.49		52	.35			

GENEEC Simulation - Hexythiazox on Pome Fruit

N	No.	1	FO	R He	exy.	th	iazo	ж		ON	1	Pome	Fru	it		* INPUT VA			ALUES *	
				C) No.APPS) INTERVAL							APPL TYPE (%DRIFT)									
	190(l R	. 19	90) 1 1		1	6200.0		51	0.0	AE	AERL_B(13.0)			. 0	.0		
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								IL HYDROLYSIS OFF (POND)												
	35.0	00			2	70.70			N/	A	1	6.60-	20	58.4	0		. 0	0	20	59.40
G -	ENER!													117V 60		DAY N		 XAM	 AX 90 DA	
											1000000	EC			100	-		200	VG GEEC	
-	3	3.03	3			3.	03			3	02			3.	nn				2.9	9

GENEEC Simulation - Fenbutatin-oxide on Pome Fruit

N	No.	1	FOR	Fenbu	tatin	oxide	ON	Pome	Fruit		* II	TUG	VALU	ES *
	ONE	(MUI		INT				SOLUBII						
1.					0	2300	.0	13.0	AERL	В(4.2	2)]	125.0	.0
I	TIELD	ANI	STA	NDARD	PONE	HALFL	IFE	VALUES	(DAYS)	6				
1								PHO!						
-	180.	00		2		N/A		100.00	-12400	.00		.00	*	*****
0	SENER:	IC E	ECs	(IN M	ICROG	RAMS/I	TEF	(PPB))					
								1 DAY GEEC						
-														

GENEEC Simulation - Etoxazole on Cotton

NCOR (IN)
.0
BINE (GNC
9.82