



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 17, 2022

Cody Kendrick  
Sr. Product Manager  
Regulatory Affairs  
SSI Maxim Company, Inc.  
c/o Landis International, Inc.  
P.O. Box 5126  
Valdosta, GA 31603

Subject: Label Amendment – To comply with PR Notice 2017-1 and PR Notice 2017-2, incorporating Tebuthiuron Interim Registration Review Decision changes, and other minor changes  
Product Name: Sprakil S-5 Brush Control Granules  
EPA Registration Number: 34913-10  
Application Date: June 11, 2018 and October 9, 2019  
Decision Number: 546407 & 556115

Dear Mr. Kendrick:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Tebuthiuron Interim Registration Review Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40

CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Jamie Harrington at (202) 566-2726 or by email at [harrington.jamie@epa.gov](mailto:harrington.jamie@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Paul Di Salvo". The signature is written in a cursive, flowing style.

Paul Di Salvo, MPS, CWB®  
Senior Regulatory Specialist  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure: Stamped Label

# SpraKil S-5

## Brush Control Granules

**Active Ingredient:**

Tebuthiuron: N-[5-(1,1-dimethylethyl)-1,3,4-thiadiazol-2-yl] -N,N'dimethylurea .....5.0%

**Other Ingredients:** .....95.0%

**Total:** .....100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
IF SWALLOWED:	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<p>For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 Monday through Friday, 8:00am to 12:00pm Pacific Time (NPIC Website: <a href="http://www.npic.orst.edu">www.npic.orst.edu</a>). For emergencies, call the poison control center at 1-800-222-1222, 24 hours a day, 7 days a week. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p><b>{SEE ADDITIONAL PRECAUTIONARY STATEMENTS &amp; DIRECTIONS FOR USE [ON BACK/SIDE PANEL/LEAFLET ATTACHED.]}</b></p>	

MANUFACTURED BY:

**SSI MAXIM CO., INC.**

P.O. Box 1954 • Kilgore, TX 75663 • (800) 346-4781

NET WEIGHT:

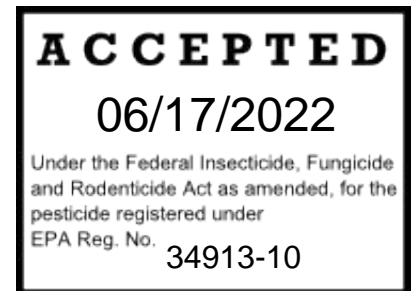
[8 x 6 LB (8 x 2.72 KG)]

[6 LB JUG]

[40 LB PAIL]

[40 LB BAG]

EPA REG. NO. 34913-10  
EPA EST. NO. 39578-TX-1



**PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS  
CAUTION**

Causes moderate eye irritation. Harmful if absorbed through skin or swallowed. Avoid contact with eyes, skin or clothing. Prolong or frequently repeated skin contact may cause allergic reaction in some individuals.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical resistant gloves made of: barrier laminate, butyl rubber  $\geq 14$  mils, nitrile rubber  $\geq 14$  mils, neoprene rubber  $\geq 14$  mils, natural rubber  $\geq 14$  mils, polyethylene, polyvinyl chloride  $\geq 14$  mils, or viton  $\geq 14$  mils.

**ENVIRONMENTAL HAZARDS**

**NON-TARGET ORGANISM ADVISORY STATEMENT:** This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

In case of spills, collect, cover, or incorporate granules/pellets spilled on the soil surfaces to prevent contamination to water. Do not apply 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 disposing of equipment washwaters or rinsate.

**GROUND WATER ADVISORY**

This product is known to leach through soil into ground water under certain conditions as a result of registered (rangeland and non-crop) uses. Use of this product in areas where soils have rapid to very rapid permeability, particularly where the water table is shallow, may result in ground water contamination.

**Use Restrictions for Ground Water Protection**

**Vulnerable Sites:** To minimize any movement of tebuthiuron to subsurface water, do not exceed the application rates specified below on treatment sites where soils have a sand or loamy sand texture throughout the soil profile and all of the following characteristics:

1. Rapid to very rapid permeability.
2. Absence of well-defined organic layers or a textural B-horizon (restricting layer of fine-textured soil).
3. The water table of an underlying aquifer is shallow.

An aquifer is defined as an "underground saturated, permeable geologic formation capable of producing significant quantities of water to a well or spring". It is the ability of the saturated zone, or portion of that zone, to yield water which makes it an aquifer (American Chemical Society, 1983). Local agricultural agencies can provide further information on the type of soil in your area and the location of shallow ground water aquifers.

Do not apply SpraKil S-5 in areas where the water table is predominately shallow (5 feet or less), such as marshy or sub irrigated areas, or areas immediately adjacent to streams or lakes which are periodically flooded, unless such use is allowed under a state-approved pesticide management program. Note: Also on

such areas, woody plants rooted directly in a shallow water table are minimally affected by applications of tebuthiuron, and poor woody plant control will result.

Do not apply SpraKil S-5 within areas identified by state or local authorities as protected ground water recharge zones.

**NON-TARGET ORGANISM ADVISORY STATEMENT:** This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

## DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

TEBUTHIURON	GROUP	7	HERBICIDE
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### Weed Resistance Management Recommendations

For resistance management, SpraKil S-5 is a Group 7 herbicide. Any weed population may contain or develop plants naturally resistant to SpraKil S-5 and other Group 7 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field. Appropriate resistance management strategies should be followed.

To delay herbicide resistance take one or more of the following steps:

- Rotate the use of SpraKil S-5 or other Group 7 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds in a field.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or certified crop advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use and crop rotation, and that considers tillage (or other mechanical control methods), cultural (e.g., higher crop seeding rates; precision fertilizer application method and timing to favor the crop and not the weeds), biological (weed-competitive crops or varieties) and other management practices.
- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: (1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; (2) a spreading patch of non-controlled plants of a particular weed species; (3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method such as hoeing or tillage. Prevent movement of resistant weed seeds to other fields by cleaning harvesting and tillage equipment when moving between fields and planting clean seed.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or certified crop advisors for additional pesticide resistance-management and/or integrated weed-management recommendations for specific crops and weed biotypes.
- For further information or to report suspected resistance, contact your retailer, representative or call 1-800-346-4781.

Application sites should be scouted before and after application to verify that the treatment was effective. Suspected herbicide-resistant weeds may be identified by these indicators:

- Failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds;
- A spreading patch of non-controlled plants of a particular weed species; and
- Surviving plants mixed with controlled individuals of the same species.

Contact your local sales representative, crop advisor, or extension agent to find out if suspected resistant weeds to this MOA have been found in your region. If resistant biotypes of target weeds have been reported, use the application rates of this product specified for your local conditions, Tank mix products that there are multiple effective mechanisms of actions for each target weed.

Report any incidence of non-performance of this product against a particular weed species to your retailer, representative or call 1-800-346-4781. If resistance is suspected, treat weed escapes with an herbicide having a different mechanism of action and/or use non-chemical means to remove escapes, as practical, with the goal of preventing further seed production.

### **Product Information**

#### **NON-CROP WEED CONTROL INDUSTRIAL USE ONLY**

SpraKil S-5 is intended for total vegetation control. It is an extremely active herbicide which will kill trees, shrubs, and other forms of desirable vegetation having roots extending into the treated area. Feeder roots of many species of desirable vegetation extend many feet beyond the drip line of the branches, and a very small amount of SpraKil S-5 in contact with one feeder root of a tree, shrub, or other desirable vegetation may cause serious injury or death to the entire plant.

An arboriculturist (tree expert) should be consulted to help you to determine if the area of proposed application is free of all roots of desirable vegetation. The effect of SpraKil S-5 on desirable vegetation may be irreversible, and its presence in the soil may prevent growth of other desirable vegetation for some years after application. Read the entire label before using SpraKil S-5 to determine if this product is suitable for the desired purpose.

### **Restrictions**

Do not apply this product via aerial application.

Do not use SpraKil S-5 on areas such as walks, driveways, streets, lawns, patios, tennis courts, swimming pools, cemeteries, or other landscaped areas, or under asphalt or concrete pavement where future landscaping is planned. Do not apply on or near field crops. Do not apply on any area into which the roots of desirable vegetation may extend. Do not apply in locations where the chemical may be washed by runoff or sheet erosion in contact with roots of desirable vegetation, as severe injury or death may occur. Roots of trees, shrubs, and other desirable vegetation may extend far beyond the drip line of the plant's branches.

Ditchbank Usage: Do not apply SpraKil S-5 to interior ditchbanks (areas which slope toward the drainage). Do not apply to ditches used to transport irrigation or potable water.

Thoroughly clean all traces of SpraKil S-5 from application equipment after use. Do not empty residues cleaned from application equipment on areas where they may come in contact with the roots of desirable vegetation or the water source for such vegetation.

Herbaceous Perennials (nonwoody plants): Do not cut forage from treated areas for feeding livestock. SpraKil S-5 may injure or suppress certain herbaceous vegetation in the treated area. Do not apply where

such injury cannot be tolerated. Injury to most herbaceous perennials is reduced if SpraKil S-5 is applied when this vegetation is dormant.

### **Best Management Practices**

To the extent possible, use a diversified approach toward weed management. Whenever possible incorporate multiple weed-control practices such as mechanical cultivation, and biological management practices. To the extent possible do not allow weed escapes to produce seeds, roots or tubers. Prevent application site to site and within-site movement of weed seed or vegetative propagules. Thoroughly clean plant residues from equipment before leaving application sites.

Identify weeds present in the application site through scouting and site history and understand their biology. The weed-control program should consider all of the weeds present. Difficult to control weeds may require sequential applications of herbicides with differing mechanisms of action. Apply this herbicide at the correct timing and rate needed to control the most difficult weed at the application site. Use a broad spectrum soil-applied herbicide with a mechanism of action that differs from this product as a foundation in a weed-control program. Do not use more than two applications of this or any other herbicide with the same mechanism of action within a single growing season unless mixed with an herbicide with another mechanism of action (MOA) with an overlapping spectrum for the difficult-to-control weeds.

If resistance is suspected, treat weed escapes with an herbicide with a different MOA or use non-chemical methods to remove escapes. Contact your local sales representative, crop advisor, or extension agent to find out if suspected resistant weeds to this MOA have been found in your region. If resistant biotypes of target weeds have been reported, use the application rates of this product specified for your local conditions. Tank mix products so that there are multiple effective mechanisms of actions for each target weed.

### **Application Instructions**

#### **For vegetation control by broadcast (ground equipment) and banded applications:**

If the treated area is to be used for haying, do not apply more than 80 lbs. (4 lbs. A.I.) per acre of product, and do not apply this product more than once per year. Grazing is allowed in areas receiving band or individual plant treatments of 80 lbs. (4 lbs. A.I.) per acre or less of product. The maximum label rate and frequency of application is 40 lbs. (2 lbs. A.I.) SpraKil S-5 per acre once every three years for vulnerable areas (where soils are sandy and depth to water table is shallow.) For all other areas, SpraKil S-5 may be applied one time in a 3-year period at a rate of up to 80 lbs. (4 lbs. A.I.) per acre of product; however, no more than 120 lbs. (6 lbs. A.I.) per acre may be applied in two consecutive treatments in any 6 year period.

#### **Spot treatments (hand-held equipment):**

SpraKil S-5 may be applied at rates up to the equivalency of 120 lbs. (6 lbs. A.I.)/ acre when needed.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

#### **PESTICIDE STORAGE:**

Store product in original container only, away from other pesticides, fertilizer, food, or feed.

#### **PESTICIDE DISPOSAL:**

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

#### **CONTAINER HANDLING:**

[Plastic Container:] Nonrefillable container. Do not reuse or refill this container.

Triple rinse (or equivalent) promptly after emptying. Then offer container for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

[Plastic Bag:] Nonrefillable container. Do not reuse or refill this container.

Completely empty bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment.

Then offer bag for recycling if available or dispose of empty bag in a sanitary landfill or by incineration.

### **Conditions of Sale and Limitation of Warranty and Liability Important Information Read Before Using Product**

To the extent consistent with applicable law, seller warrants that this product consists of the ingredients specified and is reasonably fit for use as directed on the label. No one other than officer of seller is authorized to make any warranty, guarantee, or direction concerning this product. Because the time, place, rate of application, and other conditions for use are beyond the seller's control, to the extent consistent with applicable law the seller's liability from handling, storage, and use of this product is limited to replacement of product or refund of the purchase price.