62719-267

8/14/2008



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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

22

August 14, 2008

Kenneth D. Racke, Ph.D. Regulatory Leader Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268

Subject: Miscellaneous Labeling Revisions Tracer Naturalyte Insect Control EPA Reg. No. 62719-267 Application dated May 02, 2008

Dear Dr. Racke:

The above referenced labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Please note that we have approved the this amended labeling for the subject product with the understanding that it is based on the Agency's last stamped accepted label dated September 27, 2001 and notification coded T6P/Tracer/Notif/09-11-07; and that the revisions made to the labeling are consistent with the Agency's previously approved main and supplemental labels for similar DAS spinosad products.

See enclosed copy of the stamped label for your record. If you have any questions concerning this action please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerely. George T. LaRocca,

Product Manager 13 Insecticide Branch Registration Division (7505P)

Enclosure

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(Base label for rigid containers 5 gal or less):

Tracer®

Naturalyte[®] Insect Control

A Naturalyte[®] insect control product for control of lepidopterous larvae (worms or caterpillars), leafminers, and thrips

ACCEPTED

AUG 1 4 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act,

as amended, for the pesticide

registered under EPA Reg. No. //

Group	5	INSECTICIDE
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Active Ingredients:

spinosad (a mixture of spinosyn A and		
spinosyn D)		
Other Ingredients		
Total		

Contains 4 lb of active ingredient per gallon. U.S. Patent No. 5,362,634 and 5,496,931

Keep Out of Reach of Children

Precautionary Statements

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, 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.

Environmental Hazards

This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic to aquatic invertebrates. Do not apply directly to water, 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.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Storage and Disposal

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

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Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

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

Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Shake Well Before Use -- Avoid Freezing

EPA Reg. No. 62719-267

EPA Est.

[®]Trademark of Dow AgroSciences LLC **Produced for Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268**

Net Contents

(Base label for refillable rigid containers larger than 5 gal):

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Tracer[®]

Naturalyte[®] Insect Control

A Naturalyte[®] insect control product for control of lepidopterous larvae (worms or caterpillars), leafminers, and thrips

Group		5		INSECTICIDE
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Active Ingredients:	
spinosad (a mixture of spinosyn A and	
spinosyn D)	
Other Ingredients	55.8%
Total	100.0%

Contains 4 lb of active ingredient per gallon. U.S. Patent No. 5,362,634 and 5,496,931

A C C E P T E D AUG 1 4 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 627/9-247

Keep Out of Reach of Children

Precautionary Statements

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, 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.

Environmental Hazards

This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic to aquatic invertebrates. Do not apply directly to water, 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.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Storage and Disposal

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

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Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

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

Container Reuse: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Refer to label booklet for Directions for Use.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

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EPA Reg. No. 62719-267

[®]Trademark of Dow AgroSciences LLC **Produced for Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268** EPA Est.

Net Contents ____

12

(Base label for nonrefillable rigid containers larger than 5 gal):

Tracer®

Naturalyte[®] Insect Control

A Naturalyte[®] insect control product for control of lepidopterous larvae (worms or caterpillars), leafminers, and thrips

Group	5	INSECTICIDE
	-	

Active Ingredients:

spinosad (a mixture of spinosyn A and		
spinosyn D)		
Other Ingredients		
Total	100.0%	

Contains 4 lb of active ingredient per gallon. U.S. Patent No. 5,362,634 and 5,496,931

AUG 1 4 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No62719-267

ACCEPTE

Keep Out of Reach of Children

Precautionary Statements

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, 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.

Environmental Hazards

This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic to aquatic invertebrates. Do not apply directly to water, 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.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Storage and Disposal

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

1/12

Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

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

Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use.

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EPA Reg. No. 62719-267

EPA Est.

[®]Trademark of Dow AgroSciences LLC **Produced for Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268**

Net Contents ____

T6P / Tracer / Amend / 04-30-08

(Label booklet cover):

Tracer®

Naturalyte[®] Insect Control

A Naturalyte[®] insect control product for control of lepidopterous larvae (worms or caterpillars), leafminers, and thrips

Active Ingredients:

100.0%

Contains 4 lb of active ingredient per gallon. U.S. Patent No. 5,362,634 and 5,496,931

Keep Out of Reach of Children

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. Refer to label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Refer to inside of label booklet for additional precautionary information including Directions for Usė.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Shake Well Before Use -- Avoid Freezing

EPA Reg. No. 62719-267

EPA Est.

ACCEPTE

AUG 1 4 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act,

as amended, for the pesticide

registered under

EPA Reg. No. 67

[®]Trademark of Dow AgroSciences LLC **Produced for Dow AgroSciences LLC** 9330 Zionsville Road Indianapolis, IN 46268

Net Contents

Precautionary Statements

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, 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.

Environmental Hazards

This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic to aquatic invertebrates. Do not apply directly to water, 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.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

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 instructions and exceptions pertaining to the statements on this label about personal protective 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 4 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:

- Coveralls
- Waterproof gloves
- Shoes plus socks

Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

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Do not enter or allow others to enter the treated area until sprays have dried.

Storage and Disposal

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

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Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

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

Nonrefillable containers 5 gallons or less:

Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers 5 gallons or larger:

Container Reuse: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers 5 gallons or larger:

Container Reuse: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

General Information

Tracer[®] is a Naturalyte[®] insect control product for control of many foliage feeding pests infesting labeled crops. This product's active ingredient, spinosad, is biologically derived from the fermentation of *Saccharopolyspora spinosa*, a naturally occurring soil organism. Tracer should be mixed with water and applied as a foliar spray with aerial or ground equipment equipped for conventional insecticide spraying.

General Use Precautions

Integrated Pest Management (IPM) Programs

Tracer is recommended for IPM programs in labeled crops. Tracer should be applied when field scouting indicates target pest densities have reached the economic threshold, i.e., the point at which the insect population must be reduced to avoid economic losses beyond the cost of control. Other than reducing the target pest species as a food source, Tracer does not have a significant impact on certain parasitic insects or the natural predaceous arthropod complex in treated crops, including big-eyed bugs, ladybird beetles, flower bugs, lacewings, minute pirate bugs, damsel bugs, assassin bugs, predatory mites or spiders. The feeding activities of these beneficials will aid in natural control of other insects and reduce the likelihood of secondary pest outbreaks. If Tracer is tank mixed with any insecticide that reduces its selectivity in preserving beneficial predatory insects, the full benefit of Tracer in an IPM program may not be reduced.

Insecticide Resistance Management (IRM)

Tracer contains spinosad, a Group 5 insecticide. Insect/mite biotypes with acquired resistance to Group 5 insecticides may eventually dominate the insect/mist population if Group 5 insecticides are used repeatedly in the same field or area, or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by Tracer and other Group 5 insecticides. Currently, only spinetoram and spinosad active ingredients are classified as Group 5 insecticides. These two insecticide active ingredients share a common mode of action and must not be rotated with each other for control of pests listed on this label. Spinetoram and spinosad may be rotated with all other labeled insecticide active ingredients.

To delay development of insecticide resistance, the following practices are recommended:

- Carefully follow the specific label guidelines within the use directions sections of this label, especially in regard to IRM recommendations.
- Avoid use of the same active ingredient or mode of action (same insecticide group) on consecutive generations of insects. However, multiple applications to reduce a single generation are acceptable. Treat the next generation with a different active ingredient that has a different mode of action or use no treatment for the next generation.
- Avoid using less than labeled rates of any insecticide when applied alone or in tank mixtures.
- Applications should be targeted against early insect developmental stages whenever possible.
- Base insecticide use on comprehensive IPM programs including crop rotations.
- Monitor treated insect populations in the field for loss of effectiveness.
- Contact your local extension specialist, certified crop advisor, and/or manufacturer for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.
- For further information or to report suspected resistance, contact your local Dow AgroSciences representative or by calling 800-253-3033 or over internet at www.dowagro.com.

Mixing

Always shake well before use. Avoid freezing.

Application Rate of Tracer (fl oz/acre)	Active Ingredient Equivalent (Ib ai/acre)	Acres per Gallon of Tracer
1	0.031	128
1.4	0.045	90
1.5	0.047	85
2	0.062	64
2.14	0.067	60
2.5	0.078	51
2.9	0.089	45
3	0.094	43

Application Rate Reference Table

T6P / Tracer / Amend / 04-30-08

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Tank Mixing: When tank mixing Tracer with other materials, a compatibility test (jar test) using relative proportions of the tank mix ingredients should be conducted prior to mixing ingredients in the spray tank. If foliar fertilizers are used, the jar test should be repeated with each batch of fertilizer utilizing the mixing water source. Do not use acidifying buffering agents in tank mixes with Tracer. Vigorous, continuous agitation during mixing, filling and throughout application is required for all tank mixes. Sparger pipe agitators generally provide the most effective agitation in spray tanks. To prevent foaming in the spray tank, avoid stirring or splashing air into the spray mixture.

Mixing Order for Tank Mixes: Fill the spray tank with water to 1/4 to 1/3 of the required spray volume. Start agitation. Add different formulation types in the order indicated below, allowing time for complete dispersion and mixing after addition of each product. Allow extra dispersion and mixing time for dry flowable products.

Add different formulation types in the following order:

- 1. Products in water soluble packaging
- 2. Water dispersible granules
- 3. Wettable powders
- 4. Tracer and other aqueous suspensions

Maintain agitation and fill spray tank to 3/4 of total spray volume. Then add:

- 5. Emulsifiable concentrates and water-based solutions
- 6. Spray adjuvants, surfactants and oils
- 7. Foliar fertilizers

Finish filling the spray tank. Maintain continuous agitation during mixing, final filling and throughout application. If spraying and agitation must be stopped before the spray tank is empty, the materials may settle to the bottom. Settled materials must be resuspended before spraying is resumed. A sparger agitator is particularly useful for this purpose.

Premixing: Dry and flowable formulations may be premixed with water (slurried) and added to the spray tank through a 20 to 35 mesh screen. This procedure assures good initial dispersion of these formulation types.

Spray Tank pH: A spray tank pH between 6.0 and 9.0 is suggested to achieve maximum performance of Tracer. If the water source is outside of this pH range, or tank mixing other pesticides, adjuvants, or foliar nutrients will cause the pH to fall outside this range, consider adjusting the spray tank pH to be between 6.0 and 9.0 before adding Tracer. To do this, add all other tank mix components first, then check the spray tank pH, adjust if desired, and then add Tracer. If you require additional information on how to adjust spray tank pH, contact your Dow AgroSciences representative.

Use of Adjuvants: Adjuvants may be used to improve the control of leafminers and thrips in situations where achieving uniform plant coverage is difficult (such as closed crop canopy or dense foliage), or penetration into waxy leaf surfaces is required.

- Use only adjuvant products labeled for agricultural use and follow the manufacturer's label directions. A nominal concentration of 1 to 2 quarts per 100 gallons (0.25 to 0.5% v/v) is generally sufficient.
- For leafminers and thrips, emulsified crop oils or methylated crop oil plus organosilicone combination products are recommended.
- When using adjuvants, always conduct a jar test to determine the compatibility of the various

components in the mixture. Crop safety should be determined in a small area of the crop whenever there is a significant change in spray mixture ingredients or source of water for the spray mixture.
Do not use diesel fuel or pure mineral oil.

Application

Proper application techniques help ensure thorough spray coverage and correct dosage for optimum insect control. The following recommendations are provided for ground and aerial application of Tracer. Attention should be given to sprayer speed and calibration, wind speed, and foliar canopy to ensure adequate spray coverage.

Row Crop Application

Use calibrated power-operated ground spray equipment capable of providing uniform coverage of the target crop. Orient the boom and nozzles to obtain uniform crop coverage. A minimum of 5 to 10 gallons per acre should be utilized, increasing volume with crop size and/or pest pressure. Use hollow cone, twin jet flat fan nozzles or other insecticide atomizer suitable for insecticide spraying to provide a fine to coarse spray quality (per ASABE S-572, see nozzle catalogs). Under certain conditions, drop nozzles may be required to obtain complete coverage of plant surfaces. Follow manufacturer's recommendations for ideal nozzle spacing and spray pressure. Minimize boom height to optimize uniformity of coverage and maximize deposition (optimize on-target deposition) to reduce drift.

Band Application: Band application may be appropriate when the crop is small. Nozzle selection, placement, or shielding to compensate for windy conditions is critical to ensure adequate coverage.

Aerial Application

Apply in a spray volume of 5 gallons or more per acre (10 gallons or more per acre for trees, vines or orchard crops). Nozzle configuration should provide a medium to fine dropsize per ASABE S-572 standard (see USDA-ARS or NAAA handbook). Guidance for ASABE S-572 nozzle configuration can be found at the following web site: www.cpproductsinc.com. Boom length must be less than 75% of wing or 85% of rotor span and swath adjustment (offset) to compensate for crosswinds. Observe minimum safe application height (maximum 12 feet for ag canopies). Use GPS equipment, swath markers or flagging to ensure proper application to target area. The boom nozzle configurations used should be patterned (e.g., at NAAA Fly-In) for both crosswind and near parallel winds. If application is made parallel to the wind direction, swath width should be adjusted downward. Use swath adjustment (offset) to compensate for crosswinds. Do not apply under completely calm wind conditions. It is best to apply when wind speed is between 2 to 10 mph. Under conditions of low humidity and high temperatures, adjust spray volume and droplet size upward to compensate for evaporation of spray droplets. Insect control by aerial application may be less than control by ground application because of reduced coverage.

Chemigation Application

Tracer may be applied through properly equipped chemigation systems for insect control in corn. Follow use directions for these crops in the Uses section of this label. Do not apply Tracer by chemigation to other labeled crops except as specified in Dow AgroSciences supplemental labeling or product bulletins.

General Directions for Chemigation:

Tracer may be applied through drip or overhead sprinkler irrigation systems that will apply water uniformly, including center pivot, lateral move, end tow, side (wheel) roll, traveler, solid set, micro sprinkler, or hand move. Do not apply this product through any other type of irrigation system. Sprinkler systems that deliver a low coefficient of uniformity such as certain water drive units are not recommended.

For continuously moving systems, the mixture containing Tracer must be injected continuously and uniformly into the irrigation water line as the sprinkler is moving. If continuously moving irrigation equipment is used, apply in no more than 0.25 inch of water. For irrigation systems that do not move during operation, apply in no more than 0.25 inch of irrigation immediately before the end of the irrigation cycle.

Preparation: The following use directions are to be followed when this product is applied through irrigation systems. Thoroughly clean the chemigation system and tank of any fertilizer or chemical residues, and dispose of the residues according to state and federal laws. Flush the injection system with soap or a cleaning agent and water. Determine the amount of Tracer needed to cover the desired acreage. Mix according to instructions in the Mixing section above. Continually agitate the mixture during mixing and application.

Equipment Calibration: In order to calibrate the irrigation system and injector to apply the mixture containing Tracer, determine the following: 1) Calculate the number of acres irrigated by the system; 2) Calculate the amount of product required and premix; 3) Determine the irrigation rate and the number of minutes for the system to cover the intended treatment area; 4) Calculate the total gallons of insecticide mixture needed to cover the desired acreage. Divide the total gallons of insecticide mixture needed by the number of minutes (minus time to flush out) to cover the treatment area. This value equals the gallons per minute output that the injector or eductor must deliver. Convert the gallons per minute to milliliters or ounces per minute, if needed. Calibrate the injector system with the system in operation at the desired irrigation rate. It is suggested that the injection pump/system be calibrated at least twice before operation, and the system should be monitored during operation.

Operation: Start the water pump and irrigation system, and let the system achieve the desired pressure and speed before starting the injector. Check for leaks and uniformity and make repairs before any chemigation takes place. Start the injection system and calibrate according to manufacturer's recommendations. This procedure is necessary to deliver the desired rate per acre in a uniform manner. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system.

Precautions:

- Lack of effectiveness or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
- If you have questions about calibration, contact state extension service specialists, equipment manufacturers or other experts.
- Do not connect an irrigation system used for pesticide application (including greenhouse systems) to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place with current certification. Specific local regulations may apply and must be followed.
- A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall operate the system and make necessary adjustments should the need arise and continuously monitor the injection.
- Do not apply when wind speed favors drift beyond the area intended for treatment. End guns must be turned off during the application if they irrigate nontarget areas.
- Do not allow irrigation water to collect or run off and pose a hazard to livestock, wells, or adjoining crops.
- Do not enter treated area during the reentry interval specified in the Agricultural Use Requirements section of this label unless required PPE is worn.
- Do not apply through sprinkler systems that deliver a low coefficient of uniformity such as certain water drive units.

Specific Equipment Requirements:

- The system must contain an air gap or approved backflow prevention device, or approved functional check valve, vacuum relief valve (including inspection port), and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow. Refer to the American Society of Agricultural Engineer's Engineering Practice 409 for more information or state specific regulations.
- The pesticide injection line must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection chemical supply.

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- A pesticide injection pipe must also contain a functional interlock, e.g., mechanical or electrical, to shut off chemical supply when the irrigation system is either automatically or manually shut down.
- The system must contain functional interlocking controls to automatically shut off the pesticide injection when the water pressure drops too low or water flow stops.
- Use of public water supply requires approval of a backflow prevention device or air gap (preferred) by both state and local authorities.
- Systems must use a metering pump, such as a positive displacement injection pump (or flow meter on eductor) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock. An electric powered pump must meet Section 675 for "Electrically Driven or Controlled Irrigation Machines" NEC 70.
- To insure uniform mixing of the insecticide in the water line, inject the mixture in the center of the pipe diameter or just ahead of an elbow or tee in the irrigation line so that the turbulence created at those points will assist in mixing. The injection point must be located after all backflow prevention devices on the water line.
- The tank holding the insecticide mixture should be free of rust, fertilizer, sediment, and foreign material, and equipped with an in-line strainer situated between the tank and the injection point.

Uses

Corn (Field Corn, Popcorn, and Corn Grown for Seed) and Teosinte

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
European corn borer	1 - 3
fall armyworm	
true armyworm	
beet armyworm	2 - 3
corn earworm	
southwestern corn borer	
western bean cutworm	

Specific Use Directions:

Application Timing: Scout for **European corn borer** and **armyworms** with enough regularity to monitor egg laying and egg hatch. Applications of Tracer should be timed to coincide with peak egg hatch of each generation. Frequent treatments may be necessary when the crop is growing rapidly, during silking or under heavy pest pressure. For **corn earworm** control, a 1- to 2-day re-treatment schedule may be necessary at silking. For control of all other pests, a 5- to 7-day re-treatment schedule may be necessary if the crop is growing rapidly or if there is heavy pest pressure.

Application Rate: Apply as a foliar spray at the rate indicated for target pest. Use a higher rate in the rate range for heavy infestations or advanced growth stages of target pests.

Spray Volume: For control of first generation **European corn borer** and **armyworms**, apply broadcast or as a directed spray into the leaf whorls. For control of second generation **European corn borer**, apply as a broadcast spray. For control of **corn earworm**, apply broadcast or direct spray to ear zone. Use sufficient spray volume and nozzle pressure to ensure thorough wetting of the silks.

Chemigation: Tracer may be applied to corn by chemigation at labeled rates. Refer to the Chemigation Application section for application guidelines for chemigation.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult

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your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state agricultural experiment station for information on alternative effective products to use in your area.

Restrictions:

• Do not apply more than a total of 6 fl oz of Tracer (0.188 lb ai spinosad) per acre per year.

- Popcorn and Corn Grown for Seed
- Preharvest Interval: Do not apply within 1 day of grain harvest or within 3 days of forage or fodder harvest.
- Field Corn and Teosinte
- Preharvest Interval: Do not apply within 28 days of grain harvest or within 3 days of fodder or forage harvest.

Cotton

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
cotton bollworm (prebloom) cotton leafperforator	1.4 - 2.9
European corn borer tobacco budworm	
armyworms (including beet armyworm, fall armyworm) cotton bollworm (post-bloom) leafminers loopers (including soybean looper, cabbage looper) saltmarsh caterpillar thrips	2.14 - 2.9

Specific Use Directions:

Application Timing:

Tobacco Budworm and/or Cotton Bollworm: For the most effective control, fields should be scouted twice per week and Tracer applied when the majority of the population is within the time of blackhead egg stage to 1/8-inch larval length. The following table illustrates the size of development of worms in relation to age and stage of development (instar) as a guide to timing treatments for optimum control:

Average Size		
Age (Days)	(inches)	Instar ¹
Hatch	1/16	1st
3	1/4	2nd
5	1/2	3rd
8	7/8	4th
10	1	5th

¹Note: A scouting schedule of only once per week is risky since hatching worms will have grown to 3rd instar before the next scouting observation has determined the need to spray.

Heavy infestations may require repeat applications but make no more than 3 applications per 30 days or 6 applications per crop. The minimal time period between applications must be 7 days. To delay resistance selection, do not treat sequential generations with the same class of insect control products. Treat when pests appear, targeting eggs at hatch or small larvae. Consult your Dow AgroSciences representative, extension service specialist, certified crop advisor or your state agricultural experiment station for any additional area use recommendations for your area.

T6P / Tracer / Amend / 04-30-08

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Beet Armyworm: Economic thresholds vary with local conditions and sampling methods. The following is an example of one such method: apply Tracer when field scouting reveals 3 or more occurrences of egg hatch or larval feeding per 100 feet of row.

Loopers: Economic thresholds vary with local conditions and sampling methods. The following is an example of one such method: apply Tracer when field scouting reveals 4 larvae per 1 foot of row or 25% defoliation.

Application Rate: Use a higher rate within the rate range and higher spray volume when one or more of the following is true: tobacco budworms or bollworms are more than 1/4 inch in length; target pest population is 2X above stated threshold level; or foliage canopy is tall/dense and worms are present in the lower part of the canopy. Heavy infestations may require repeat applications, but follow resistance management guidelines.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state agricultural experiment station for information on alternative effective products to use in your area. For **tobacco budworm and/or cotton bollworm** where early season conservation of beneficial insects is practical, use Tracer to control the 1st and 3rd generation of tobacco budworm and/or cotton bollworm. Where conservation of beneficial insects is not as critical (for example, fields have received non-selective early season treatments for boll weevil or lygus bugs), use Tracer to control either the 2nd or 3rd generation of tobacco budworm and/or cotton bollworm.

Restrictions:

- Preharvest Interval: Do not apply within 28 days of harvest.
- Minimum Treatment Interval: Do not make applications less than 5 days apart for high rates of application.
- Do not apply more than a total of 14.4 fl oz of Tracer (0.45 lb ai spinosad) per acre per growing season.

Grass Forages, Grass Grown for Seed, Pastures, Rangeland and Sod Farms

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
beet armyworm	1 – 2
fall armyworm	(0.031 – 0.062 lb
sod webworms	ai/acre)
southern armyworm	
true armyworm	
other lepidopterous	
species	

Specific Use Directions:

Application Timing: Scout at least weekly and consider the impact of both pests and beneficials. Treat when economic thresholds are exceeded, targeting eggs at hatch or small larvae. Heavy infestations may require repeat applications, but follow resistance management guidelines on the product label. Consult your Dow AgroSciences representative, extension service specialist, certified crop advisor or your state agricultural experiment station for any additional recommendations applicable to your area.

Application Rate: Use a higher rate in the rate range for heavy infestations or advanced growth stages of target pests.

Resistance Management: Do not apply more than 3 times in any 21-day period. Whenever Tracer is applied up to 3 times in succession, this should be followed by no use of Tracer for a 21-day period or rotation to another insecticide class. Do not make more than 6 applications per season.

Restrictions:

- Preharvest Interval: Do not apply within 3 days of harvest for hay or fodder. There is no preharvest interval for forage.
- Do not apply more than a total of 6 fl oz of Tracer (0.188 lb ai spinosad) per acre per season.
- · Do not allow cattle to graze from treated area until spray has dried.

Peanut

Pests and Application Rates:

	Tracer
Pests	(fl oz/acre)
cabbage looper	1.5 - 3
corn earworm	
European corn borer	
green cloverworm	
red-necked peanut worm	
saltmarsh caterpillar	
soybean looper	
tobacco budworm	
velvetbean caterpillar	
armyworms, including:	2 - 3
beet armyworm	
fall armyworm	
true armyworm	
yellowstriped armyworm	

Specific Use Directions:

Application Timing: Regularly monitor the population size of each of the labeled pests. Treat when pests appear, targeting eggs at hatch or small larvae. Consult your Dow AgroSciences representative, extension specialist, certified crop advisor or your state agricultural experiment station for any additional local use recommendations for your area.

Application Rate: Use a higher rate in the rate range for larger larvae or moderate to severe infestations and/or larger plant volume.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state agricultural experiment station for information on alternative effective products to use in your area.

Restrictions:

- Preharvest Interval: Do not apply within 3 days of nut harvest or within 14 days of forage.
- Minimum Treatment Interval: Do not make applications less than 7 days apart.
- Do not apply more than a total of 9 fl oz of Tracer (0.28 lb ai spinosad) per acre per crop or make more than 3 applications per calendar year.
- Do not allow grazing of crop residue or harvest of crop residue for hay until 14 days after the last application.

Small Cereal Grains

Small cereal grains (crop group 15) including barley, buckwheat, oats, rye, triticale, wheat

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
cereal leaf beetle	1 - 3
armyworms corn earmworm (headworm) grasshoppers (suppression) southwestern corn borer webworms	1.5 - 3

Specific Use Directions:

Application Timing: Scout for **armyworms** and **headworms** with enough regularity to monitor egg laying and egg hatch and treat when thresholds are reached. Applications of Tracer perform best when timed to coincide with peak egg hatch of each generation.

Application Rate: Apply as a foliar spray at the rate indicated for target pest. Use a higher rate in the rate range for heavy infestations and/or difficult spray coverage situations.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state agricultural experiment station for information on alternative effective products to use in your area.

Restrictions:

- Preharvest Interval: Do not apply within 21 days of grain or straw harvest or within 3 days of forage, fodder or hay harvest.
- Do not apply more than a total of 9 fl oz of Tracer (0.28 lb ai spinosad) per acre per year.
- Do not allow cattle to graze treated area until spray has dried.

Sorghum, Grain Amaranth, Milo, Pearl Millet, and Proso Millet

Pests and Application Rates:

Posts	Tracer
Г С Э І Э	(II UZIACIE)
armyworms	1.5 - 3
corn earworm (headworm)	
southwestern corn borer	
webworms	

Specific Use Directions:

Application Timing: Scout for **armyworms** and **headworms** with enough regularity to monitor egg laying and egg hatch and treat when thresholds are reached. Applications of Tracer perform best when timed to coincide with peak egg hatch of each generation.

Application Rate: Apply as a foliar spray at the rate indicated for target pest. Use a higher rate in the rate range for heavy infestations and/or difficult spray coverage situations.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state

agricultural experiment station for information on alternative effective products to use in your area.

Restrictions:

- Preharvest Interval: Do not apply within 7 days of grain or fodder harvest or within 14 days of forage harvest.
- Do not apply more than a total of 14.4 fl oz of Tracer (0.45 lb ai spinosad) per acre per year.
- · Do not allow cattle to graze treated area until spray has dried.

Soybean

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
green clover worm	1 - 2
soybean looper	
true armyworm	
velvet bean caterpillar	
armyworms (such as fall	1.5 - 2
armyworm, yellowstriped	
armyworm, beet	
armyworm)	
corn earworm (podworm)	
saltmarsh caterpillar	

Specific Use Directions:

Application Timing: Treat when field counts or crop injury indicates damaging pest populations are present or developing. Time applications to treat small larvae and use sufficient spray volume to ensure good coverage.

Application Rate: Use a higher rate in the rate range for heavy infestations and/or difficult spray coverage situations.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state agricultural experiment station for information on alternative effective products to use in your area.

Restrictions:

- Preharvest Interval: Do not apply within 28 days of harvest.
- Do not apply more than a total of 6 fl oz of Tracer (0.188 lb ai spinosad) per acre per year.
- · Do not feed treated forage or hay to meat or dairy animals.

Tobacco

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
thrips	1.4 - 2.9
tobacco budworm	
tobacco hornworm	

Specific Use Directions:

Application Timing: Scout for **lepidopterous larvae** with enough regularity to monitor egg laying and egg hatch and treat when thresholds are reached. Applications of Tracer perform best when timed to coincide with peak egg hatch of each generation.

Application Rate: Apply as a foliar spray at the rate indicated for target pest. Use a higher rate in the rate range for heavy infestations and/or difficult spray coverage situations.

Spray Volume: Use a minimum of 20 gallons of water per acre to obtain full coverage of foliage, increasing volume and nozzles per row as necessary with crop maturity.

Resistance Management: Do not make more than 2 consecutive applications of Group 5 insecticides (spinetoram and spinosad). If additional treatments are required after 2 consecutive applications of Group 5 insecticides, rotate to another class of effective insecticides for at least one application. Consult your local Dow AgroSciences representative, extension specialist, certified crop advisor, or state agricultural experiment station for information on alternative effective products to use in your area.

Restrictions:

- · Preharvest Interval: Do not apply within 3 days of harvest.
- Minimum Treatment Interval: Do not make applications less than 7 days apart.
- Do not apply more than a total of 14.4 fl oz of Tracer (0.45 lb ai spinosad) per acre per year or make more than 3 applications per 30 days or 6 applications per crop.

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T6P / Tracer / Amend / 04-30-08

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