



000264-00447-092398

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Systems Integration Group, Inc.

Best Available Copy

SEP 23 1998

Mr. Nick Somma
Rhône-Poulenc Ag Company
2 T.W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

Dear Mr. Somma:

Subject: Asulox[®] Herbicide
EPA Registration No. 264-447
Your Letter Dated September 22, 1998, Request
to Revise Labeling To Restrict Turf Use to
Sod Farms Only

The proposed label amendment for Asulox herbicide
has been reviewed and found to be acceptable under
the Federal Insecticide, Fungicide and Rodenticide Act as
amended, provided that you:

1. Submit a copy for the final printed label before
you release the product for shipment under the
subject label.

If this condition is not complied with, the registration
will be subject to cancellation in accordance with FIFRA, Section
6(e). Your release for shipment of the product constitutes
acceptance of this condition.

A stamped copy of the labeling is enclosed for your
records.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

E.Wilson:DisketteABC31:09-23-98

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

ASULOX[®] Herbicide

**FOR AGRICULTURAL OR COMMERCIAL USE ONLY
NOT FOR USE BY HOMEOWNERS**

For Postemergent Weed Control in Sugarcane, Turf, Ornamentals, Christmas Tree Plantings and Non-Cropland

ACTIVE INGREDIENT: Sodium salt of asulam (methyl sulfanilylcarbamate)* 36.2%
INERT INGREDIENTS: 63.8%

*Equivalent to 33.1% asulam or not less than 3.34 lbs. per gallon.

EPA Reg. No. 264-447

EPA Est. No. 572-42-FL-001

KEEP OUT OF REACH OF CHILDREN CAUTION

For **PRODUCT USE** Information Call 1-800-334-9745
For **MEDICAL** And **TRANSPORTATION** Emergencies **ONLY** Call 24 Hours A Day 1-800-334-7577

PRECAUTIONARY STATEMENTS

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 23 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

~~264-447~~

CAUTION

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Avoid contact with skin, eyes, or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, and 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.

ENGINEERING CONTROL STATEMENTS

When handlers use closed systems, enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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.

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Wash with plenty of soap and water. If irritation persists, get medical attention.

IF IN EYES: Flush with water for 15 minutes and get medical attention if irritation persists.

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 clean equipment or dispose of equipment washwater in a manner that will contaminate resources. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
Read entire label before using this product.

Do not apply ASULOX[®] Herbicide through any type of irrigation systems.

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 regulations.

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 expectations pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry intervals. 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 coveralls, waterproof gloves, and shoes plus socks.

STORAGE AND DISPOSAL

STORAGE

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Store at temperatures above 20° F.

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. Puncture and dispose of in a sanitary landfill, by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

RETURNABLE/REFILLABLE CONTAINERS

After use, return the container to the point of purchase or designated locations. This container must only be refilled with ASULOX® Herbicide. DO NOT REUSE THE CONTAINER FOR ANY OTHER PURPOSE. Prior to refilling, inspect thoroughly for damage such as cracks, punctures, abrasions and damaged or worn out threads on closure devices. Do not refill or transport damaged or leaking containers. Check for leaks after refilling and before transportation. For information on the disposal of unused, unwanted product, contact Rhône-Poulenc at 1-800-334-9745. For information on cleanup of spills, contact Rhône-Poulenc at 1-800-334-7577. If the container is not being refilled, return it to the point of purchase.

SUGARCANE

ASULOX® Herbicide can be applied to either plant cane or cane grown from stubble. Apply ASULOX® as a water mix spray for ground applications. Use 15 to 100 gallons of water per acre, depending on local practice. For aerial application, ASULOX® Herbicide should be mixed in 3 to 5 gallons of water per acre, except in Hawaii, where 5 to 10 gallons of water per acre should be used.

Addition of an adjuvant cleared for use on growing crops to the ASULOX® Herbicide water mix spray will improve weed control when environmental conditions are not optimal. Use either a non-ionic surfactant containing a minimum of 80% active ingredient at the rate of 1 to 2 quarts per 100 gallons (0.25 to 0.5% V/V) of water mix spray or a crop oil concentrate containing 80 to 85% paraffin based petroleum oil and 15 to 20% non-ionic surfactant at the rate of 4 quarts per 100 gallons (1% V/V) of water mix spray.

The rates of ASULOX® Herbicide given below are for broadcast applications. For banded application, reduce the rate proportionally to the width of the band according to the following formula:

$$\frac{\text{Band width(inches)}}{\text{Row width(inches)}} \times \text{Broadcast Rate} = \text{Band Rate/Acre}$$

For spot treatments, use a 5% v/v ASULOX® spray (1 gallon per 20 gallons of water). Do not exceed 8 pints of ASULOX® per acre per treatment.

SUGARCANE

Single Application Per Growing Season

WEED SPECIES	SPECIAL INSTRUCTIONS	RATE
Itchgrass or Raouigrass (<i>Rottboellia exaltata</i>)	Apply when the grass is 8 inches tall or less (addition of surfactant is necessary).	8 pints/acre
Johnsongrass (<i>Sorghum halepense</i>)	Apply when the grass is between 12 to 18 inches tall. Johnsongrass should be actively growing and the average air temperature should be at least 60°F or higher.	
Paragrass or Californiagrass (<i>Brachiaria mutica</i> or <i>Panicum purpurascens</i>)	Apply when the grass is 6 to 8 inches tall or less.	
Crabgrass (<i>Digitaria spp.</i>)	If treatment is made before the grass reaches seed head formation then the lower rate should be used. If the grass is in early seed head formation then the higher rate should be used.	6 to 8 pints/acre
Alexandergrass (<i>Brachiaria plantaginea</i>)	If treatment is made when the grass is 6 to 8 inches tall or less, then the lower rate should be used. If the grass is greater than 8 inches tall, then the higher rate should be used.	
Coxtail (<i>Setaria spp.</i>)		
Prosegrass (<i>Eleusine indica</i>)		
Loadleaf Panicum (<i>Panicum adspersum</i>)		
Barnyardgrass (<i>Echinochloa crusgalli</i>)		

SUGARCANE

Two Applications Per Growing Season

This may be required when initial weed infestations are heavy and/or when rhizome Johnsongrass is present. Two applications may also be used when treating weed species which germinate at different times during one growing season.

WEED SPECIES	SPECIAL INSTRUCTIONS	1ST APPLICATION	2ND APPLICATION
Crabgrass (<i>Digitaria spp.</i>)	At each application the grass should be treated before seed head formation.	6 to 8 pints/acre	6 to 8 pints/acre
Itchgrass or Raouigrass (<i>Rottboellia exaltata</i>)	At each application the grass should be 8 inches tall or less (Addition of surfactant is necessary).	8 pints/acre	8 pints/acre
Johnsongrass (<i>Sorghum halepense</i>)	At each application the grass should be between 12 and 18 inches tall.	8 pints/acre	8 pints/acre

RESTRICTIONS AND PRECAUTIONS: Sugarcane

- ASULOX® Herbicide should be used when the weeds are actively growing.
- Cover crops may be planted if plowed under and not grazed.
- The following pre-harvest intervals for ASULOX® Herbicide applications to sugarcane must be observed: 1) Mainland U.S.A (except Louisiana) – 140 days; 2) Louisiana only – 100 days; 3) Hawaii – 400 days.
- Do not graze or feed sugarcane fodder and forage to livestock.
- Cultivation and/or fertilizer applications or any other cultural practice that disturbs the root system of targeted weed species may result in less than optimum control when applying ASULOX® Herbicide. These practices are not recommended within 7 days prior to or within 7 days after applications of ASULOX® Herbicide.
- Differences in crop tolerance to ASULOX® among Sugarcane varieties has been reported in Louisiana. Contact your local County Agent or University Extension Specialist for further information.

NON-CROPLAND

ASULOX® Herbicide may be used as a postemergent treatment to control weeds on non-cropland areas such as:

- | | |
|------------------------------------|--|
| Boundary fences | Railroad rights-of-way and yards |
| Fence rows | Storage areas and industrial plant sites |
| Highway and roadside rights-of-way | Utility rights-of-way and yards |
| Lumberyards | Warehouse lots |
| Pipeline rights-of-way | |

A surfactant may be added to the spray solution at 0.25% by volume. (Use an approved non-ionic surfactant.)

Apply ASULOX® as a water-mix spray for ground applications using 20 to 100 gallons of solution per acre, depending on local practice, to control the following weed species:

WEED SPECIES	SPECIAL INSTRUCTIONS	RATE
Crabgrass (<i>Digitaria spp.</i>)	Apply before the grass reaches seed head formation.	1 to 2 gals/acre
Johnsongrass (<i>Sorghum halepense</i>)	Apply when the grass is 18 inches or taller. Use the higher rate in well established heavy infestations. For spot treatment in Hawaii, use the higher rate in 100 gallons of solution and apply an amount not to exceed 50 gallons of total solution per acre.	
Paragrass or Californiagrass (<i>Brachiaria mutica</i> or <i>Panicum purpurascens</i>)	Apply before the grass reaches seed head formation. For spot treatment in Hawaii, use the same rate in 100 gallons of solution and apply an amount not to exceed 50 gallons of total solution per acre.	
Western Bracken (<i>Pteridium aquilinum</i> var. <i>pubescens</i>)	Apply when the fern is in full frond.	7 to 8 pints/acre

CHRISTMAS TREE PLANTINGS

ASULOX® Herbicide may be used as a postemergent treatment in Christmas Tree Plantings where Douglas Fir, Grand Fir, Nobel Fir or Scotch Pine are grown. Do not graze or feed foliage from treated areas to livestock.

ASULOX® Herbicide should be applied as a water mix spray. For ground application, use a minimum of 20 gallons of solution per acre, and for aerial application, use a minimum of 10 gallons of solution per acre. Do not use a wetting agent with ASULOX® Herbicide.

WEED SPECIES	SPECIAL INSTRUCTIONS	RATE
Western Bracken (<i>Pteridium aquilinum</i> var. <i>pubescens</i>)	Apply after bud break and hardening or firming of new tree growth. Bracken should be in full frond prior to treatment.	1 Gal/Acre

**TURF
(Sod Farms Only)**

ASULOX® Herbicide can be applied on St. Augustinegrass and Tifway 419 Bermudagrass turf. Apply one application per season postemergence to the weeds listed below. Use 20 to 50 gallons of water per acre in the spray solution.

TURF SPECIES	WEED SPECIES	RATE
St. Augustinegrass	Bullgrass (<i>Paspalum supinum</i>), Crabgrass (<i>Digitaria sp.</i>), Goosegrass (<i>Eleusine indica</i>)	5 pints/acre
Tifway 419 Bermudagrass	Sandbur (<i>Cenchrus sp.</i>)	

Do not use a surfactant. Do not apply to turf which is under stress or freshly mowed.

ORNAMENTALS

ASULOX[®] Herbicide can be applied as a single, postemergent, broadcast application on the following ornamentals:

JUNIPERS		YEWS
<i>Juniperus andorra</i>	<i>Juniperus horizontalis</i>	<i>Taxus cuspidata</i>
<i>Juniperus chinensis</i>	<i>Juniperus litoralis</i>	<i>Taxus media</i>
<i>Juniperus conferta</i>	<i>Juniperus sabina</i>	<i>Podocarpus macrophyllus</i>

Treatment should be made with a minimum of 20 gallons of water per acre. Do not use a surfactant.

WEED SPECIES	SPECIAL INSTRUCTIONS	RATE
Barnyardgrass (<i>Echinochloa crusgali</i>)	Apply when the weeds are between the stages of early seedling and early seed head formation.	1 gal/acre
Crabgrass (<i>Digitaria sp.</i>)		
Fall Panicum (<i>Panicum dichotomiflorum</i>)		
Foxtails (<i>Setaria sp.</i>)		
Goosegrass (<i>Eleusine indica</i>)		
Horseweed (marestail) (<i>Conyza canadensis</i>)		

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station weed specialists for specific recommendations for local weed problems and for information on possible lower dosages.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use when it is used in accordance with such directions, and (c) that the directions, warnings and other statements on this label are based upon responsible experts' evaluation of reasonable tests of effectiveness of toxicity to laboratory animals and to plants and of residues on food crops and upon reports of field experience. Tests have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTIES EXPRESSED OR IMPLIED AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

THIS WARRANTY DOES NOT EXTEND TO AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE SHALL BE LIMITED AT THE MANUFACTURER'S OPTION TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

Rhône-Poulenc Ag Company
 P.O. Box 12014, 2 T.W. Alexander Drive
 Research Triangle Park, North Carolina 27709
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 ASULOX[®] Herbicide (PENDING) Submitted 9/22/98.