

264-666

3-28-2000

1/10



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. James A. Barron  
Aventis CropSciences USA LP  
2 Alexander Drive  
Research Triangle Park, NC 27709

MAR 28 2000

Dear Mr. Barron:

Subject: Puma<sup>®</sup> 1EC Herbicide  
EPA Registration No. 264-666  
Application and Letter Dated March 15, 2000, Request  
To Amend Registration To Package Puma 1EC Herbicide  
in a Twin Pack with Bronate Herbicide (EPA Reg. No.  
264-438) Under the Name Puma<sup>®</sup> Pro Herbicide with  
Respective Containers Designated as Pro One Herbicide,  
Container #1 and Pro Two Herbicide, Container #2

The subject application to amend the registration of Puma  
1EC Herbicide by packaging it with Bronate<sup>®</sup> Herbicide to form  
a twin-pack for distribution has been reviewed and found accept-  
able under the Federal Insecticide, Fungicide and Rodenticide  
Act (FIFRA), as amended, provided that you:

1. Submit a revised application with a completed section  
III, on EPA Form 8570-1.
2. Submit one (1) copy of the final printed labeling  
before you release the product (twin-pack) for shipment  
under the subject amended labeling.

If these conditions are 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 these conditions.

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

Sincerely yours,

A handwritten signature in cursive script that reads "Joanne I. Miller".

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

Enclosure



# Pro One Herbicide

## (Container #1)

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577  
For PRODUCT USE Information Call 1-888-AVENTIS (1-888-283-6847)

### FIRST AID

**IF SWALLOWED:** Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF IN EYES:** Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention. If possible, bring the container and labeling to the attending physician.

**NOTE TO PHYSICIAN:** Possible mucosal damage may contraindicate the use of gastric lavage. May pose an aspiration pneumonia hazard.

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

##### WARNING

Causes substantial but temporary eye injury or skin irritation. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear coveralls worn over short-sleeved shirt and short pants, socks and chemical resistant footwear, goggles or face shield and chemical resistant gloves (such as Nitrile, Butyl, Neoprene and/or Barrier Laminated). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

##### ENGINEERING CONTROL STATEMENT:

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 170.40(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.
- Remove PPE immediately after handling this product. Wash the pesticide off of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates or nontarget plants. 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 by cleaning of equipment or disposal of equipment washwaters.

### PRO ONE HERBICIDE

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Keep container tightly closed when not in use. Avoid cross contamination with other pesticides.

Do not store over 100°F or below 32°F. Do not use or store near heat or open flame.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Empty containers should be triple rinsed (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NET CONTENTS: 1.64 GALLONS

4/10

# Pro Two Herbicide (Container #2)

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577  
For PRODUCT USE Information Call 1-888-AVENTIS (1-888-283-6847)

## STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention. Do not induce vomiting, contains petroleum distillates. Do not give anything by mouth to an unconscious person.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush with water for 15 minutes. Get medical attention.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### WARNING

Harmful if swallowed, or absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical resistant to this product are listed below. If you want options, follow the instructions for category F on EPA chemical resistance category selection chart.

Applicators and other handlers must wear coveralls over a long-sleeved shirt and long pants; chemical resistant gloves such as barrier laminate, butyl rubber, nitrile rubber, or Viton gloves; a chemical resistant apron when cleaning equipment; protective eyewear, chemical resistant headgear for overhead exposure; and chemical resistant footwear plus socks.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. 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.

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.

If you will handle a total of 60 gallons or more of this product per day, you must use a mechanical transfer system for all mixing and loading operations. If this product is packaged in a 30 gallon drum, you must use a mechanical transfer system which terminates in a drip-free hard coupling which may be used only with a spray or mix tank which has been fitted with a compatible coupling. If you do not presently own or have access to a mechanical transfer system with this type of coupling, contact your dealer for information on how to obtain such a system or to modify your present system. When using a mechanical transfer system, do not remove or disconnect the pump or probe from the container until the container has been emptied and rinsed. The pump or probe system must be used to rinse the empty container and to transfer the rinsate directly to the mixing or spray tank.

Application from a tractor with a completely enclosed cab or aerial application is required whenever this product is applied to 360 or more acres in a day. The closed systems and enclosed cabs must be used 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.

To reduce exposure to residues, wash the spray rig, tractor, and all other equipment used to handle or apply this product with water daily or before using the equipment for any other purpose.

APPLICATION BY CHEMIGATION must be done by fixed pipe, overhead sprinkler systems or hand moved pipe. If hand moved pipe is used for chemigation, the pipe must not be handled in any way until 24 hours after chemigation has been completed and residues have been flushed from the system. When applying by chemigation, no person may enter the application site unless in an enclosed vehicle.

DURING AERIAL APPLICATION, human flaggers are prohibited unless in enclosed vehicles. Aerial application is prohibited within 300 feet of residential areas (e.g., homes, schools, hospitals, shopping areas, etc.)

#### 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. 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

This pesticide is toxic to wildlife and fish. Use with care when applying to areas frequented by wildlife or adjacent to any body of water. For terrestrial uses, 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 apply when weather conditions favor drift from target areas. Do not contaminate water when disposing of equipment washwaters.

5/10

# Pro Two Herbicide (Container #2) (Continued)

## PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

**CAUTION:** Pro Two Herbicide contains low volatile isooctyl ester of MCPA. At high air or ground surface temperatures, vapors from this product may cause injury to susceptible plants. This fact should be considered when applying Pro Two Herbicide.

## MIXING, LOADING AND HANDLING INSTRUCTIONS

### 2.5 Gallon Containers

It is strongly recommended that special care be taken in mixing and loading this product. Hands should be placed on the container in such a way as to avoid possible drip or splash. Correct procedures for mixing and loading are provided in Aventis CropScience's Educational Program.

## PRO TWO HERBICIDE STORAGE AND DISPOSAL

### STORAGE

Do not contaminate water, food, or feed by storage or disposal. Store at temperatures above 3° F. If allowed to freeze, remix before using.

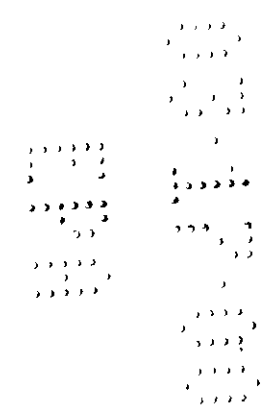
### PESTICIDE DISPOSAL

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). Then 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.

NET CONTENTS: 2.5 GALLONS



6/10

# Puma<sup>®</sup> Pro Herbicide

**A Twin-Pack Product for the Control of Both Grass and Broadleaf Weeds in Winter Wheat, Spring Wheat, and Durum Wheat**

## 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 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 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 over long-sleeved shirt and long pants; socks and chemical resistant footwear. Wear goggles or face shield, and chemical resistant gloves (such as nitrile, butyl, neoprene, and/or barrier laminate), chemical-resistant headgear for overhead exposure and protective eyewear.

### GENERAL INFORMATION

Puma<sup>®</sup> Pro Herbicide is a broad spectrum post-emergence herbicide for the control of both grass and broadleaf weeds in winter wheat, spring wheat, and durum wheat. Grass weeds controlled include wild oats, green foxtail, foxtail millets, and barnyardgrass. In addition, numerous broadleaf weeds are controlled including redroot pigweed, wild mustard, wild buckwheat, and common lambsquarters.

This twin pack of Puma<sup>®</sup> Pro Herbicide contains 1.65 gallons of Pro One Herbicide (marked as container number 1) and 2.5 gallons of Pro Two Herbicide (marked as container number 2). The twin pack will treat 20 acres of wheat, applied at a rate of 0.66 pints per acre (10.6 fl. oz/A) for Pro One and at 1.0 pint per acre (16 fl. oz./A) for Pro Two.

DO NOT apply to barley.

### APPLICATION INFORMATION

**All of the components in the Puma<sup>®</sup> Pro Herbicide package MUST be tank mixed according to the mixing instructions in this label and applied according to the recommendations given in the following section, or a reduction in weed control and/or a potential for crop injury will occur.**

A. Ground Application: DO NOT apply when winds are gusty, or when conditions will favor movement of spray particles off the desired spray target. To avoid drift and ensure consistent weed control, apply Puma<sup>®</sup> Pro Herbicide with the spray boom as low as possible while maintaining a uniform spray pattern. Apply a minimum of 10 gallons of spray solution per acre, using a recommended spray pressure of 40 psi with flat-fan nozzle tips spaced 10 to 20 inches apart across the boom. Ground speed for application should not exceed 10 mph. To get uniform spray coverage, use nozzles to provide 200 to 350-micron size droplets. DO NOT apply with hollow-cone type nozzles or other nozzles that produce a fine droplet spray. Under dense weed populations or adverse growing conditions, a high spray volume (15 to 20 gpa) is required for best weed control.

B. Aerial Application: Calibrate the spray equipment prior to use. Puma<sup>®</sup> Pro Herbicide should be applied in a minimum of 5 gallons of water per broadcast acre. To get uniform spray coverage, use nozzles to provide 200 to 350-micron size droplets. DO NOT use raindrop nozzles. Aerial applications with this product should be made at a maximum height of 10 feet above the crop with low drift nozzles at a maximum pressure of 40 psi. Avoid application under conditions where uniform coverage cannot be obtained or where excessive spray drift may occur.

Flagmen and loaders should avoid inhalation of spray mist and prolonged contact with skin.

### INFORMATION ON HERBICIDE TOLERANT WEEDS

Repeated use of the same herbicide or related herbicides may result in rare, naturally tolerant weeds multiplying to economic infestations. In areas with consistent use of the same herbicide or herbicide mode-of-action, crop rotation and application of alternative, mode-of-action herbicides are encouraged to prevent and/or reduce weed tolerance. For further information, contact an Aventis CropScience Company representative or your local or State extension service.

### TIMING OF APPLICATION

Apply Puma<sup>®</sup> Pro Herbicide to the crop from the 2-leaf stage up to 60 days prior to harvesting wheat in the States of Minnesota, Montana, North Dakota, and South Dakota. DO NOT apply Puma<sup>®</sup> Pro on wheat within 70 days of harvest in other states.

Puma<sup>®</sup> Pro will control susceptible grass weeds in the 2-leaf to 2-tiller stage of growth and broadleaf weeds up to the 8-leaf stage or 4 inches in height, whichever comes first. Herbicide application must occur within these windows. Blackgrass can be controlled over a wide range of growth stages, from the 2-leaf through the advanced tillering stage. Windgrass will be controlled from emergence to a height of 3 inches. Applications should be made to young, vigorously growing weeds.

Puma® Pro has no effect via the soil and will only control emerged grass weeds. Puma® Pro, when applied as recommended, controls the annual grass and broadleaf weeds listed in Table 1 and 2, respectively.

Table 1  
Grasses Controlled With Puma® Pro Herbicide

Grass Weed Species, Common Name	Grass Weed Species, Scientific Name
Green foxtail	<i>Setaria viridis</i>
Foxtail millets (volunteer), common, Siberian, Hungarian, German millet	<i>Setaria italica</i>
Volunteer corn	<i>Zea mays</i>
Yellow foxtail *	<i>Setaria lutescens</i>
Proso millet (volunteer, wild)	<i>Panicum iliaceum</i>
Barnyardgrass	<i>Echinochloa crusgalli</i>
Blackgrass	<i>Alopecurus myosuroides</i>
Hooded canarygrass	<i>Phalaris paradoxa</i>
Littleseed canarygrass	<i>Phalaris minor</i>
Windgrass	<i>Apera interrupta</i>
Wild oats	<i>Avena fatua</i>
Field Sandbur	<i>Incertus M.A. Curtis</i>
Woolly cupgrass	<i>Erichloa villosa</i>

\* Suppression only of yellow foxtail.

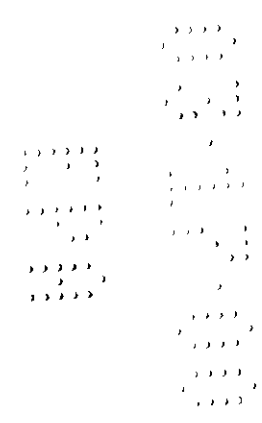


Table 2  
Broadleaf Weeds Controlled With Puma® Pro Herbicide

Broadleaf Weed Species, Common Name	Broadleaf Weed Species, Scientific Name
Annual Sowthistle	<i>Sonchus oleraceus</i>
Black mustard	<i>Brassica nigra</i>
Black Nightshade	<i>Solanum nigrum</i>
Common Cocklebur	<i>Xanthium strumarium</i>
Common Lambsquarters	<i>Chenopodium album</i>
Common Tarweed	<i>Hemizonia congesta</i>
Cow cockle	<i>Saponaria vaccaria</i>
Cutleaf Nightshade	<i>Solanum triflorum</i>
Eastern Black Nightshade	<i>Solanum ptycanthum</i>
Coast fiddleneck	<i>Amsinckia intermedia</i>
Field Pennycress	<i>Thlaspi arvense</i>
Green Smartweed	<i>Polygonum scabrum</i>
Hairy Nightshade	<i>Solanum sarachoides</i>
Horned Poppy	<i>Glaucium corniculatum</i>
Jimsonweed	<i>Datura stramonium</i>
Ladysthumb	<i>Polygonum persicaria</i>
Lanceleaf sage	<i>Salvia reflexa</i>
London rocket	<i>Sisymbrium irio</i>
Marshelder	<i>Iva xanthifolia</i>
Pennsylvania Smartweed	<i>Polygonum pennsylvanicum</i>
Pepperweed spp.	<i>Lepidium spp.</i>
Redroot pigweed	<i>Amaranthus retroflexus</i>
Russian thistle	<i>Salsola kali</i>
Shepherdspurse	<i>Capsella bursa-pastoris</i>
Silverleaf Nightshade	<i>Solanum elaeagnifolium</i>
Smooth pigweed	<i>Amaranthus hybridus</i>
Spiny pigweed	<i>Amaranthus spinosus</i>
*Sunflower	<i>Helianthus annuus</i>
Tall waterhemp	<i>Amaranthus tuberculatus</i>
Tartary Buckwheat	<i>Fagopyrum tataricum</i>
Tumble mustard	<i>Sisymbrium altissimum</i>
Wild Buckwheat	<i>Polygonum convolvulus</i>
Wild mustard	<i>Sinapis arvensis</i>
Yellow rocket	<i>Barbarea vulgaris</i>

\* For control of sunflower, delay application until first sunflower seedlings emerging are 4 inches in height.



9/10

### MOISTURE EFFECTS ON ANNUAL GRASS WEED CONTROL

The following conditions will result in optimum wild oat control:

1. Adequate soil moisture which occurs under normal rainfall in wheat following a fallow year.
2. Temperatures lower than 85° F for several days prior to application.

Low soil moisture levels, low humidity, and high temperatures might slightly reduce the wild oat control provided by Puma® Pro Herbicide.

Foxtail (pigeongrass) can be controlled over a wide range of soil moisture conditions. Foxtail under drought stress will exhibit rolled leaves ("onion leaf") and should not be sprayed as poor control may result. Apply Puma® Pro when conditions improve.

### MIXING INSTRUCTIONS

1. Assure the spray tank is thoroughly clean.
2. Fill the spray tank with one-half of the total amount of clean water required for the application and start the agitation or by pass system.
3. First add the recommended amount of Pro One Herbicide (Container #1), into the tank.
4. Add the recommended amount of Pro Two Herbicide (Container #2) and continue agitation.
5. Triple rinse the emptied containers, numbers 1 and 2, into the spray tank.
6. Add the remaining amount of water while agitation continues. Spray immediately. Spray mixture should not be left in spray tank overnight.

### SPRAYER CLEANUP

To avoid subsequent injury to crops other than wheat, thoroughly clean all mixing, loading and spray equipment immediately following applications of Puma® Pro Herbicide as follows:

1. Drain tank; thoroughly rinse spray tanks, boom and hoses with clean water. Loosen and physically remove any visible deposits.
2. Fill the tank with clean water and 1 gallon of household ammonia\* (contains 3% active) for every 100 gallons of water. Flush hoses, indicators, boom and nozzles with the cleaning solution. Then add more water to completely fill the tank. Circulate the cleaning solution through the tank and hoses for at least 15 minutes. Again flush the hoses, boom and nozzles with the cleaning solution and then drain the tank.
3. Remove the nozzles and screens and clean separately in a bucket containing cleaning agent and water.
4. Repeat Step 2.
5. Rinse the tank, boom and hoses with clean water.
6. The rinsate may be disposed of on site or at an approved waste disposal facility.

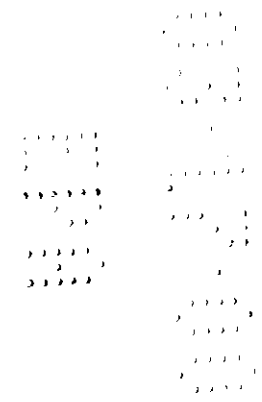
\*Equivalent amounts of ammonia or an approved cleaner (listed below) can be used in the cleanout procedure. Carefully read and follow the individual cleaner instructions.

### APPROVED CLEANERS

- Protank Cleaner—Manufactured for Cenex/Land O'Lakes Agronomy Co.
- Chem-Tank Cleaner & Neutralizer—Manufactured by Farmbelt Chemicals, Inc.
- "Incid-Out"—Manufactured by Precision Laboratories, Inc., Northbrook, IL
- Nutra-Sol—Compounded for Thomas G. Kilfoil Co., Inc., San Bruno, CA.
- Tank and Equipment Cleaner—Manufactured by Loveland Industries, Inc.
- Tank-Aid—Manufactured for Cornbelt Chemical Company

### SPECIAL NOTES

1. Rainfall within 1 hour of an application may cause a reduction in weed control.
2. DO NOT make more than 1 application in a growing season.
3. DO NOT apply this product through any irrigation system.
4. Due to reduced weed control, do not tank mix with other herbicides, surfactants, or liquid fertilizers.
5. DO NOT use when there is hazard from drifting mists. Coarse sprays are less likely to drift.
6. DO NOT graze treated fields within 45 days after application.



10/10

### IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Aventis CropScience. All such risks shall be assumed by the user or buyer.

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Puma is a registered trademark of Aventis CropScience.

Aventis CropScience USA LP  
P.O. Box 12014, 2 T.W. Alexander Drive  
Research Triangle Park, North Carolina 27709

Puma Pro Herbicide (PENDING) Submitted 1/99, Resubmitted 3/16/00.

